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Karl G. Anuta (WSB No. 21346)
8 Law Office of Karl G. Anuta, P.C.
9 735 S.W. 1st Ave., 2nd Floor
Portland, Oregon 97204
10 T: (503) 827-0320 / F: (503) 288-6551
11 kga@integra.net

The Honorable Robert S. Lasnik

12 Thane Tienson (WSB No. 13310)
Landye Bennett, Blumstein
13 1300 S.W. 5th Ave., Suite 3600
Portland, Oregon 97201
14 T: (503) 224-4100 / F: (503) 224-4133
15 ttienson@lbblawyers.com

16 **UNITED STATES DISTRICT COURT**
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

17 THE COALITION TO PROTECT PUGET
18 SOUND HABITAT,
19 Plaintiff,
v.
20 U.S. ARMY CORPS OF ENGINEERS, *ET*
AL.,
21 Defendants,
and
22 TAYLOR SHELLFISH COMPANY, INC.,
23 Defendant-Intervenor.

No.: 2:16-CV-00950-RSL

24 **DECLARATION OF KARL G. ANUTA IN
SUPPORT OF COALITION MOTION FOR
AN AWARD OF FEES AND EXPENSES**

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27 Page 1 – DECL. OF KARL G ANUTA
IN SUPPORT OF COALITION MOTION
FOR AN AWARD OF FEES AND EXPENSES
28

CASE NOS. 2:16-CV-00950 AND 2:17-CV-01209

LAW OFFICE OF KARL G. ANUTA,
P.C.
TRIAL ATTORNEY
735 S.W. First Avenue
Portland, OR 97204

1
2 CENTER FOR FOOD SAFETY,
3 Plaintiff,
4 v.
5 U.S. ARMY CORPS OF ENGINEERS, *ET*
6 *AL.*,
7 Defendants,
8 and
9 PACIFIC COAST SHELLFISH GROWERS
10 ASSOCIATION.
11
12
13 Defendant-Intervenor.
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16
17

No.: 2:17-CV-01209-RSL

I, Karl G. Anuta, Declare:

1. I am lead counsel for plaintiff Coalition to Protect Puget Sound Habitat (the
2 Coalition) in this matter. I am over the age of 18 years. If called as a witness I would
3 and could testify to the following as a matter of my own personal knowledge.

2. I have been practicing law and have been a member of the Oregon State
3 Bar for 33 years. I have been a member of the Washington State Bar for 29 years. I
4 have been admitted to practice before the U.S. District Court in the Western District of
5 Washington for 28 years.

3. I have spent most of my career engaged in complex federal and state
4 environmental litigation. A copy of my CV, which details this experience, is attached to
5 this Declaration and is incorporated by reference and marked as Exhibit A.

4. As a result of my training and experience, I possess distinctive knowledge

27 Page 2 – DECL. OF KARL G ANUTA
28 IN SUPPORT OF COALITION MOTION
FOR AN AWARD OF FEES AND EXPENSES

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1 and specialized skills in environmental and natural resources law.
2

3 5. I have collected and compiled all the time records for this case, for both
4 myself, Mr. Tienson, Mr. Sargetakis, and any law clerks or paralegals. Those hours are
5 attached as Exhibit B.

6 6. As those time records show, I spent 735.72 hours on this litigation, and my
7 law clerks spent 501.25 hours. Of that, we are only seeking recovery for 570.22 hours of
8 my time, and 462.5 hours of law clerk time.

9 7. My time was primarily spent (i) meeting or talking with the Coalition
10 representatives; (ii) formulating strategy for addressing NWP 48 problems; (iii) assisting
11 with Coalition comment drafting to highlight the legal issues that would be foremost in
12 the litigation; (iv) preparation of the Petition to Suspend that was submitted to the Corps;
13 (v) providing advice to client representatives on FOIA requests to the Corps and other
14 agencies to obtain key documents for use in fact checking any proposed Administrative
15 Record (AR); (vi) outlining legal research needed or law clerks or co-counsel and
16 engaging in research on various issues; (vii) reviewing legal research and analysis
17 prepared by law clerks or co-counsel; (viii) drafting of the Complaint and other
18 subsequent pleadings; (ix) negotiating and communicating with opposing counsel on
19 various issues; (x) reviewing the AR indexes compiled by co-counsel; (xi) reviewing key
20 parts of the AR and outlining potential use of those; (xii) strategizing with and
21 coordinating work done by the other attorneys and law clerks assisting in this case; (xiii)
22 drafting, reviewing and editing drafts of various pleadings including the Cross Motions
23 for Summary Judgment and the Remedy briefing; (xiv) preparing and assisting co-
24

1 counsel to prepare for oral argument on the Cross Motions for Summary Judgment; (xv)
2 presenting oral argument on the Cross Motions for Summary Judgment; and (xvi)
3 providing advice to client representatives on NWP 48 and NWP 48 litigation related
4 issues.

5 8. I have carefully exercised billing discretion and judgment to try to remove
6 any time that was in my view excessive or duplicative from the hours for which we seek
7 recovery. I have also been careful to not seek recovery for work that I performed that
8 could have been performed by a non-attorney. I reviewed my time records prior to the
9 filing of this Motion for an award of attorney's fees. The hours for which recovery is
10 sought were reasonably spent on work necessary to advance this litigation and to help
11 plaintiff achieve the success that it did.

12 9. Time spent by plaintiffs' counsel on this case was in line with other record
13 review cases involving issues surrounding the Clean Water Act, National Environmental
14 Policy Act, and the Administrative Procedures Act.

15 10. Time that I spent working on this case took away time which could have
16 been spent on work for other clients.

17 11. I seek \$640/hr for my time spent on this case, and \$145/hr for law clerk
18 time on this case.

19 12. This rate, and the rates of Mr. Tienson, Mr. Sargetakis, and the law clerks
20 are in my opinion reasonable. I have cross checked with multiple attorneys and other
21 sources to verify the reasonableness of these hourly rates.

22 13. From time to time during the pendency of this litigation, CPPSH has

1 incurred costs. These costs include the cost of train tickets to and from the Seattle area
2 three times since 2015, the filing fee for this lawsuit, hotel accommodations for the night
3 before oral argument, and research fees. These costs were paid out of pocket by my
4 firm, and then reimbursed to me by CPPSH. The total for these costs is \$1,525.28
5 There is an itemization of these Costs/Expenses that is attached to this Declaration as
6 Ex. C.

7 14. Based on my personal knowledge of billing practices of attorneys in
8 private practice in Washington and Oregon, I am confident that the rates sought in this
9 matter are at or even below market rate in Seattle Washington. Based upon those facts
10 and the other Declarations submitted concurrently with this Declaration, as well as the
11 information provided in those Declarations and in the Motion and Memorandum in
12 Support, it is my opinion that the hourly rates sought for myself, for Mr. Sargetakis, and
13 for Mr. Tienson, are all reasonable market rates for attorneys practicing in the Seattle
14 area, performing complex environmental litigation, with the respective background and
15 expertise of each attorney.
16

17 I declare under penalty of perjury under the laws of the state of Washington and
18 pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.
19

20 Executed on this 18th day of September, 2020.
21

22 Respectfully submitted,
23

24 /s/ Karl G. Anuta
25 Karl G. Anuta (WSB No. 21346)
26 Law Office of Karl G. Anuta, P.C.
735 S.W. 1st Ave., 2nd Floor
Portland, Oregon 97204
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28 Page 5 – DECL. OF KARL G ANUTA
IN SUPPORT OF COALITION MOTION
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KARL G. ANUTA

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Oregon & Washington

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E-MAIL

KGA@INTEGRA.NET

RESUME OR CURRICULUM VITAE

KARL G. ANUTA

Law Office of Karl G. Anuta, P.C.
735 SW First Ave. 2nd Floor
Portland, Oregon 97204
503-827-0320

BAR MEMBERSHIP

Oregon Supreme Court;
Washington Supreme Court
U.S. District Court, District of Oregon
U.S. District Court, Western District of Washington
U.S. District Court, Eastern District of Washington
U.S. Court of Appeals, Ninth Circuit

EDUCATION

Lewis & Clark College, Portland, Oregon, 1977-81
B.S. Political Science; Externship, Washington D.C., Fall 1980; Fencing Team

Northwestern School of Law, at Lewis & Clark, Portland, Oregon, 1982-86
J.D. Certificate in Environmental and Natural Resources Law;
Honor Council 1982-83, Admissions Committee 1985-86

PROFESSIONAL POSITIONS

Law Office of Karl G. Anuta, P.C., Portland, Oregon - Jan. 2008-present
Litigation of complex environmental, personal injury, and assorted other cases.

Sokol & Anuta, P.C., Portland, Oregon - Shareholder, Jan. 1998-Dec. 31, 2007
Three attorney firm. Litigation of complex injury, environmental, and other cases.

Sokol & Associates, P.C., Portland, Oregon - Senior Associate, Feb. 1994-Dec. 1997
Litigation of civil rights, personal injury and environmental cases.

Jolles, Sokol & Bernstein, P.C., Portland, Oregon - Associate, Aug. 1986-Feb. 1994
Small firm, focusing on labor law, personal injury, and medical malpractice cases.

HONORS & AWARDS

Trout Unlimited - 1991 - Certificate for contribution to the protection of cold water fisheries.

Oregon Natural Resource Council - 1992 - Conservation Achievement Award

1000 Friends of Oregon - 1992 - Citizen Mentor Certificate

U.S. Army Corps of Engineers, Portland District - 1994 - Environmental Advisory Board

Northwest Environmental Defense Center - 2002 - Volunteer Attorney of the Year

1000 Friends of Oregon - 2002 - Certificate of Appreciation, as Cooperating Attorney

Lewis & Clark Law School - 2003 - Distinguished Environmental Law Graduate Award

Washington State Bar - 2004 - Pro Bono Publico Service Commendation

University of Oregon Public Interest Environmental Law Conference - 2009 - Kerry L. Ryberg Award for Environmental Activism

SELECTED EXAMPLES OF REPRESENTATION

Salt Caves Dam Opposition, Lead Attorney, 1985-1998

Assisted with and then represented, coordinated, and advised the Sierra Club, Oregon Trout, and five other conservation organizations in multiple state and federal administrative proceedings and court cases opposing licensing of a hydroelectric project on Oregon's Upper Klamath River. Lead counsel in all cases spawned by the project, among them: City of Klamath Falls v. EQC, 318 Or 532 (1994)(denial of CWA 401 Cert. upheld) & City of Klamath Falls v. Babbitt, 947 F.Supp. 1 (1996)(designation as Wild & Scenic River upheld).

Oregon Environmental Council v. Kunzman, 614 F.Supp. 657 (D.Or 1985), 636 F.Supp. 632 (D.Or 1986), 817 F.2d 484 (9th Cir.1987)

Assisted with NEPA case on proposed aerial pesticide spraying for Gypsy Moths. Prepared successful appeal to Ninth Circuit on attorneys' fees.

Oregon Natural Resources Council v. U.S. Coast Guard, 1987

Wrote briefs and assisted with successful NEPA TRO lawsuit to halt a proposed jet boat race through a wildlife refuge on the Snake River, during nesting season, and a subsequently successful EAJA attorneys' fees dispute.

Northwest Environmental Defense Center (NEDC) v. Thomas, 1986-1988

Lead counsel in precedent setting CWA citizen suit against EPA, to force implementation of CWA § 303(d) (TMDLs) in Oregon.

NEDC et al v. Unified Sewerage Agency, 1988-1990

Participated in settling Clean Water Act citizen suit against municipal sewage agency.

Resulted in a 1.1 million dollar settlement and cleanup agreement.

Boger v. Norris & Stevens Inc. et al., 109 Or App 90 (1991) rev. den. 312 Or. 588 (1992)
Three week trial of toxic water exposure injury case, resulting in jury verdict of over \$750,000.
Verdict upheld on appeal.

NEDC v. U.S. Forest Service, 1991-92

Successful FOIA litigation to obtain release of Forest Service staff recommendations on a ski area expansion plan EIS preferred alternative, which had been given to the developer but not to the public.

WaterWatch v. Oregon Water Resources Department, 1993

Successful challenge to improper issuance of a water appropriation permit or right, on Arch Cape Creek at Oregon's coast.

Grossman v. City of Portland, 33 F.3d 1200 (1994)

Civil rights suit against municipality, for arrest of protestor for carrying a sign in a public park during Rose Festival. Successfully overturned trial court dismissal on police/municipal immunity grounds and obtained substantial monetary settlement.

Buggsi Inc. v. Chevron USA Inc., 857 F.Supp. 1427 (1994)

Trespass, nuisance and CERCLA lawsuit for landowner with underlying gasoline contamination. Established exception to state SOL limits, based on federal hazardous waste statutes, and obtained significant property damage settlement.

Crawford v. Kaiser Permanente, 1994-95

Lead counsel in multi-million dollar medical malpractice case for wrongful birth/life on behalf of parents and disabled child. Obtained settlement that preserved private, state and federal disability benefits and created additional extra-needs trust worth in excess of \$1,000,000.

National Wildlife Federation et al v. Aapaoa, 1995

Co-counsel in successful challenge to Siskiyou Nat'l Forest allowance of suction dredge mining activities, in contravention of NW Forest Plan.

ONRC v. Daley, 6 F.Supp.2d 1139 (D.Or.1998)

Local counsel in the law suit that forced NMFS to list Oregon coho salmon as endangered under the Endangered Species Act.

Parker v. Moeller's et al, 1999

Toxic exposure and property damage claim for multiply chemically sensitive neighbor of tree nursery. Obtained settlement of over \$200,000.

Friends Of Mt. Hood et al v. USFS & Mt. Hood Meadows Ski Area, 1997-2001

Lead counsel in multiple federal court challenges to Ski Area expansion plan, as well as a Clean Water Act suit against ski area and USFS. Obtained precedent setting CWA Consent Decree, and a court issued injunction against further expansion until additional NEPA studies were done.

Friends Of East Fork v. N.M.F.S., 2000

Successful FOIA suit against federal agency to force disclosure of EIS & HCP documents actually written by gravel mine consultants, and intended as a template for agency draft HCP/DEIS.

Friends Of East Fork v. JL Storedahl, 1999-2004

Represented, coordinated, and advised local conservation groups in multiple state and federal administrative and federal court proceedings, opposing the proposed expansion of a gravel mine on the banks of the East Fork of the Lewis River, in Southwest WA. Ultimately obtained and then enforced a Clean Water Act Consent Decree.

Multiple Herbicide Drift Cases, 2006-2017

Represented various individuals in damages cases (large and small) arising out of misapplication or use of pesticides, that caused harm to persons or property.

Citizens For Responsible Development v. D.E.Q. & D.S.L., 2009-2019

Represented and advised local business and citizen group opposing siting of WalMart Super Center on top of vernal pool wetlands and next to a designated critical salmon habitat stream, in The Dalles, OR. Successfully obtained revocation of a Clean Water Act Stormwater Construction Discharge permit issued by state DEQ. Challenged State wetlands permit as well as various other State permits in Court. Obtained precedent setting Opinion on wetland permitting issue: *CFRD v. Wal-Mart et al*, 295 Or App 310 (2018). Ultimately was successful in stopping construction of the project.

Benjamin v. Douglas Ridge Rifle Club, 2010

Represented plaintiff in precedent setting Clean Water Act & Res. Conserv. Recovery Act law suit against 60 year old Gun Club. Obtained Federal Court Consent Decree specifying requirements for wetland fill removal and lead contamination clean up of shooting range.

NEDC et al v. Grabhorn, Inc., 2008-2013

Represented conservation groups to limit discharges from leaking landfill, to nearby river. Obtained precedent setting Summary Judgment rulings on application of the Clean Water Act to polluted ground water, and ultimate a favorable Federal Consent Decree under both Clean Water Act and Resource Conservation and Recovery Act.

Columbia Riverkeeper v. Port of St. Helens, 2012

Successful Oregon Public Records Act case to obtain Coal Terminal Leasing agreements entered into by a local Port.

Meeker et. el. v. Bullseye Glass, 2016-2019

Assisted in preparing and filing Class Action case for Nuisance/Trespass over heavy metal air emissions from a glass factory. Class was Certified, and KGA was appointed one of the Class Counsel on February 2, 2018. Case was subsequently settled for \$6.5 Million, with final approval of the settlement granted at a fairness Hearing in May 2019.

Kramer, et al. v. City of Lake Oswego, 2017-2018

Successfully assisted a conservation group (Association of NW Steelhead, Inc.) in petitioning

for review by Oregon Supreme Court, of a Public Trust case involving access to public lake. Filed Amicus Briefing on merits in Supreme Court of Oregon, on same.

TEACHING/PUBLISHING ACTIVITIES

Oregon State Bar, CLE, Speaker, Recent Development in Environmental Law -"TMDLs and You" - Bend, Or. November 1989

University of Oregon, Land, Air and Water Conference, Speaker - "Litigating Free Flowing River" - Eugene, Or. March 1990

Water Quality, Water Quantity: The Reluctant Marriage, Conference Planner/Organizer - Portland, Or. February 1991

Northwest Rivers Council, Hydro Licensing/Re-licensing Workshop, Speaker - "How To Stop A Dam" - Seattle, Wash. May 1991

Storm Water Discharge Seminar, Speaker - "Liability For Damages From Storm water Runoff" - Portland, Or. April 1992

U.S. Forest Service, Ski Area Coordinator Conference, Speaker - "Is There Room on the Mountain" - Crystal, Wash. January 1993

Northwestern School of Law at Lewis & Clark, Portland, Or., Environmental Litigation Course - Assisted Adjunct Professor with class on the practical skills needed in to litigate environmental cases - Spring Terms 1993-1999

Oregon State Bar, Environmental & Natural Resources Section Annual Meeting, Speaker - "Instream Water Rights" - Kahnetta, Or. September 1993

University of Oregon Law School, Land, Air and Water Conference, Speaker - "Clean Water Act Citizen Suits" - Eugene, Or. March 1994

Assoc. of Public Works Administrators, 1995 Int'l Public Works Congress and Exposition, Speaker - "Lawsuits as Best Management Practices" - Dallas Tex. August 1995

Premises Liability: Preparation and Trial of a Difficult Case in OR, Speaker and Co-Author - Portland, Or. August 1997

Oregon Trial Lawyers Association, Trial Lawyer Magazine, Author - "10 Premises Liability Tips" - Spring 1999

Oregon State Bar, Environmental & Nat. Res. Law CLE/BarBook, Author - Chapter 18 - "Toxic Torts" - 2002, update published 2006

University of Oregon Law School, Land, Air and Water Conference, Speaker - "Starting

An Environmental Law Public Interest Law Practice" - Eugene, Or. March 2011

Oregon State Bar, Administrative Law CLE/BarBook, Author - Chapter 6 - "Extraordinary Remedies in Administrative Cases" - 2011, update published 2016

COMMUNITY ACTIVITIES

Northwest Environmental Defense Center, Board of Directors, 1986-present (President, 1989-1995, and 2000-2017, Vice-President, 1995-1999; 2017-2018)

Organize and supervise attorneys and students involved in nonprofit environmental litigation group. Represent group in numerous administrative, political, and judicial proceedings involving water and related development issues in the Pacific Northwest.

Waterwatch of Oregon, Board of Directors, 1989-present (Vice President 2018-present)
Nonprofit organization dedicated to the management and protection of Oregon's water resources to support both a healthy environment and economy.

Pacific Rivers Council (formerly Oregon Rivers Council), Board of Directors, 1989-1997
Nonprofit group focused on protecting and properly managing the waters and cold water fishery resources of the Pacific Northwest.

Friends Of Mount Hood, Board of Directors, 1989-present
Helped found tax exempt conservation coalition organized to "watchdog" development (particularly ski area expansions) on Mount Hood, Oregon.

OTHER EXPERIENCES

Security Guard (armed)-Wallace Security, Portland, Oregon 1981-82

Political Theory Thesis-Lewis & Clark College, 1981-The Nature of Man: Good or Evil:
Comparing Hobbes, Rousseau, Plato & Machiavelli

INTERESTS AND HOBBIES

Cooking, Canoeing, Sea Kayaking, Fly Fishing, Skiing & Old House Repair.

References, Writing Samples & Further Digressions available upon request

TRIAL ATTORNEY
LICENSED IN
OREGON & WASHINGTON

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KGA@INTEGRA.NET

September 18, 2020

Coalition to Protect Puget Sound Habitat

HOURS

4/23/2013	Review file materials; Prepare for meeting clients;	4.00 TWT No Charge
4/24/2013	Meeting with clients;	1.50 TWT
4/24-29/2013	Review multiple emails from potential client representative, with multiple related documents; Review documents in preparation for conference call; Telephone conference with potential client representative; Multiple emails exchanged with potential client rep on various issues, including representation and need for coordinated strategy on various issues related to Nationwide Permit 48 ("NWP 48");	3.00 KGA No Charge
5/3/2013	Review email from client rep with NWP 48 registrations and multiple other potentially relevant documents; Begin review of same;	.50 KGA
5/6/2013	Review materials from client rep on various prior proceedings; Begin outline of strategy ideas;	2.75 KGA
5/7/2013	Prepare for and attend meeting with client and Karl Anuta about strategy;	4.50 TWT
05/7/2013	Meeting and conference call with co-counsel Tienson ("TWT") and client rep L.H. to go over general strategy and brainstorm ideas; Emails following-up on meeting with client rep and TWT;	1.75 KGA

5/7/2013	Draft Retainer Agreement; Send to co-counsel for review;	.50 KGA No Charge
5/8/2013	Review Notice of substitution filed by TWT in <i>Seattle Shellfish</i> ; Review email from client rep L.H. about prior attorney; Review email from client rep with AG Opinion on aquaculture issues;	.25 KGA No Charge
5/9/2013	Review notice from <i>Seattle Shellfish</i> Court that it will not accept simple substitution notice; Email exchanges with co-counsel Tiensen on same; Review Retainer Agreement questions sent by L.H.; Review additional pleadings in <i>Seattle Shellfish</i> case; Email exchange with TWT about <i>Seattle Shellfish</i> case;	.75 KGA No Charge
5/13/2013	Phone call with Kent Hanson about Seattle Shellfish case status and settlement prospects; Email exchanges with KGA and clients; Draft Motion;	2.00 TWT
5/13/2013	Telephone call with client attorney D.B. about strategy and work distribution; Multiple emails exchanged with TWT on same; Review summary from client rep C.P. of Chinook related concerns;	2.00 KGA
5/13/2013	Review signed Retainer Agreement; Review Washington AG opinion on shellfish harvesting exemption from HPA permitting; Briefly evaluate same; Review confirmation from client rep C.P. that prior attorney on <i>Seattle Shellfish</i> will withdraw; Email exchange with TWT and client rep on status of <i>Seattle Shellfish</i> negotiations;	1.75 KGA No Charge
5/14/2013	Review multiple emails from <i>Seattle Shellfish</i> related counsel on signing documents to effectuate withdrawal as well as Minterbrook Oyster Company proposed lease and letter from concerned tide flat owner; Provide detailed advice to client rep L.H. on same; Review list of shoreline Hearings Board Thurston County Appeal issues forwarded by client rep L.H.;	2.00 KGA No Charge
5/14/2013	Update preliminary thoughts/strategy outline for taking on NWP 48, both facially and "as applied"; Forward to co-counsel to get his thoughts and additions;	.50 KGA
5/15/2013	Prepare and file Stipulation re: Seattle Shellfish lawsuit;	.25 TWT No Charge

5/15/2013	Review FOIA requests and comment; Message to client;	.25 TWT
5/15/2013	Review proposed stipulation and Order in <i>Seattle Shellfish</i> on substitution from co-counsel; Review client draft Washington Public Record Act (WPRA) requests to various agencies; Provide advice on same; Begin legal research on Marine Mammal Protection Act (MMPA) enforcement; Email exchanges with co-counsel on status of <i>Seattle Shellfish</i> and status of retainer signatures;	1.50 KGA No Charge
5/15/2013	Review the Corps Seattle District Website; Review L.H. FOIA requests to Corps on NWP 48 issues; Provide advice on same;	.50 KGA
5/17/2013	Review L.H. inquiry and provide advice on possible sources of marine biologists; Review Stipulation and Order on substitution of counsel filed in <i>Seattle Shellfish</i> case;	.20 KGA No Charge
5/21/2013	Review signed Order in <i>Seattle Shellfish</i> approving substitution;	.10 KGA No Charge
5/29/2013	Review client rep L.H. email with Industry "SHB Summary Judgment Motion ("Sum. Jud. Mot."); Begin review of same; Review client rep L.H. WPRA requests to Health Department and WDFW;	.60 KGA No Charge
5/30/2013	Provide preliminary NEPA/SEPA advice to client reps;	.40 KGA No Charge
5/31/2013	Review email from L.H.;	.25 TWT
6/7/2013	Review Order of Dismissal; Phone call with Kent Hanson re: background; Email exchange with KGA and L.H.;	.85 TWT No Charge
6/7/2013	Review <i>Seattle Shellfish</i> Voluntary Dismissal; Send to client reps and co-counsel with thoughts on same; Review TWT message about conversation with DOJ attorney about same;	.10 KGA No Charge
6/10/2013	Review Court Notice of <i>Seattle Shellfish</i> case closure;	.10 KGA No charge
6/11/2013	Review Notice from Court on <i>Seattle Shellfish</i> ;	.10 TWT

6/11/2013	Follow up with TWT on NWP 48 strategy outline;	.10 KGA No Charge
6/12/2013	Review email from KGA; Phone call with DOJ attorney Kent Hanson; Respond to strategy Memo; Legal research re: CAAPs and NWP 48;	1.50 TWT
6/13/2013	Review letter to Corps with attachments;	1.25 TWT
6/13/2013	Phone calls with co-counsel on strategy for NWP 48 challenge; Conference calls with other attorneys and with former local NMFS biologist to gain further information on Corps and NMFS processes (both past and on-going) of NWP 48 authorizations;	1.00 KGA
6/14/2013	Prepare for meeting with Kent Hanson, DOJ and NOAA Fisheries biologist;	1.50 TWT
6/14/2013	Outline additional strategy ideas precipitated by phone discussions; Follow up with co-counsel on same;	.75 KGA
7/7/2013	Finalize multi page Strategy Outline; Forward to L.H./C.P. and co-counsel;	.85 KGA
7/9/2013	Review and respond to client rep L.H. questions about FOIA requests to Corps;	.40 KGA
7/15-16/2013	Review 60-day Notice on Drake Bay; Provide thoughts to client on same;	.25 KGA No Charge
7/25/2013	Review Northern California decision; Review KGA\ message;	.50 TWT No Charge
7/25/2013	Lengthy phone call with client rep L.H. on Corps situation, plans for future submittals to Corps, etc.;	1.00 KGA
7/25/2013	Email to L.H. on various SHB issues; Follow up with TWT on same;	.50 KGA No Charge
8/2/2013	Review of email from L.H. with DNR press release about Geoduck Clam Leases; Provide advice and questions for follow up with DNR;	.25 KGA No Charge
8/3/2013	Review emails from co-counsel with additional thoughts on DNR situation; Review email from client rep L.H. with additional thoughts on DNR lease and Corps cumulative impact issues;	.25 KGA No charge

8/5/2013	Review email from KGA and respond to same; Phone call with KGA;	.25 TWT
8/5/2013	Review email from client rep C.P.; Provide advice on SEPA DNR issues and ESA issues;	.25 KGA No Charge
8/8/2013	Review NMFS proposed NOAA rockfish near shore Critical Habitat proposal forwarded by client rep C.P.;	.10 KGA No Charge
9/3/2013	Follow up email to client rep L.H. on various issues;	.10 KGA No Charge
9/6/2013	Review client rep L.H. response;	.10 KGA No charge
9/13/2013	Phone call with KGA on status;	.10 TWT
10/23-28/2013	Review detailed email from client rep L.H. with SHB testimony and a variety of other information;	1.25 KGA No Charge
11/3-5/2013	Review client rep L.H. email with SHB decision; Read SHB decision; Review of documents from SHB case; Phone call and email to attorney D.B. to try to ensure no duplication of effort; Follow up email to clients with info provided by D.B.;	3.50 KGA No Charge
11/4/2013	Review email and phone message; Review SHB decision (preliminary only);	.50 TWT No Charge
11/5/2013	Phone call with KGA and L.H.; Review email from L.H.;	1.00 TWT No Charge
11/5/2013	Review SHB decision;	.50 TWT No Charge
11/5/2013	Begin review of FOIA CDs from Corps, sent by client rep L.H.; Phone calls with TWT to strategize next steps;	2.00 KGA
11/6/2013	Email exchange with L.H. and KGA;	.50 TWT

11/6/2013	Review client rep L.H. email on cumulative impacts; Review email string forwarded by client rep L.H. between citizen Corbett and Corps; Provide thoughts/advice to clients about challenge to Nationwide and inconsistency between Corps email to Corbett and actual Seattle District NWP 48 usage;	1.00 KGA
11/9/2013	Review follow up emails from client reps L.H. and C.P. on SEPA, local permitting, mapping, and related issues; Follow up with L.H. on Industry "back dating" of tide flat leases issue with questions on same;	.15 KGA No Charge
11/11/2013	Phone call to L.H. on SHB Hearing provide advice on same;	.25 TWT No Charge
11/11/2013	Review additional Corps documents; Review emails from client reps, and associated documents; Research to locate additional information on Seattle District permits and conditions;	1.20 KGA
11/12/2013	Briefly review NMFS jeopardy BiOp on NWP 48 to see what cumulative impact analysis (if any) it contains; Locate and evaluate NEPA Cumulative impact analysis by Seattle District and Corps HQ; Work on draft 4 page outline of strategy and a list of questions to be answered; Begin drafting FOIA/WPRA requests for client reps related to same;	4.60 KGA
11/13/2013	Provide excerpts of key documents and detailed outline of thoughts/strategy options and a list of 17 outstanding questions to L.H./C.P.; Follow up with TWT on same;	1.95 KGA
11/14/2013	Review materials from L.H. and KGA; Begin drafting letter to Corps;	.50 TWT
11/15/2013	Finalize billing statement and send to L.H.;	.85 KGA No Charge
11/20/2013	Review phone message and emails from L.H. about SHB and Japonica NPDFS permitting;	.35 KGA No Charge
11/21/2013	Multiple emails exchanged with L.H. to schedule conference call with her and TWT to make decision about moving forward with case against Corps over NWP 48;	.40 KGA No Charge

11/22/2013	Review emails; Conference call with L.H. and KGA; Phone call with Kent Hanson re: status of Corps permitting and public comment;	1.50 TWT
11/22/2013	Phone call with L.H. and TWT to discuss next steps in NWP 48 challenge;	.90 KGA
11/25/2013	Review phone message from TWT (about called with Corps attorney);	.10 KGA
11/26/2013	Email exchange with KGA; Phone call to regional counsel for Corps;	.25 TWT
11/26/2013	Phone call to Corps to find out more info; Emails with TWT about who at the Corps we should contact; Review Corps Website about contact information;	.40 KGA
11/27/2013	Emails exchanged with TWT on who Corps current general counsel is;	.10 KGA
12/2/2013	Conference call with KGA on status and conversion with Corps attorney;	.25 TWT
12/2/2013	Locate and send key Corps Website links related to NWP 48 and FOIA issues to TWT and L.H.;	.50 KGA
12/3/2013	Draft and submit FOIA request to Corps to get list of all registrations under NWP 48 and all pending Applications under same; Review FOIA officer response; Email to L.H./C.P. and TWT with thoughts on next steps; Multiple emails exchanged with L.H./C.P. on same; Provide additional advice on cumulative impact issues to C.P.; Review multiple emails from C.P. with prior comments to Corps and some analysis of impacts from NWP 48 by NMFS and others, as well as misc. science articles; Begin review of same;	1.85 KGA
12/4/2013	Review materials provided by Corps; Email to L.H.; Research potential claims, cumulative impact, and PVC issue;	3.00 TWT
12/4/2013	Follow up with <i>Preserve Our Island</i> attorney to get his thoughts on applicability of that decision and to talk through his Briefing and the Corps response; Review emails from TWT on PVC pipe issues; Review C.P. emails on same;	1.15 KGA
12/5/2013	Review draft FOIA request;	.50 TWT

12/5/2013	Draft second detailed FOIA request related to Corps and applicant compliance with Regional Conditions on NWP 48 as it currently exists; Send draft FOIA request to TWT to submit;	.60 KGA
12/6/2013	Email exchange with L.H.; Review maps;	.75 TWT
12/6/2013	Review email from L.H. with contact information and introduction to near shore science expert; Emails with TWT on FOIA request submittal; Prepare and submit additional FOIA for maps that show locations of all NWP 48 projects, including but not limited to updates to "red dot" map; Review email from L.H. with maps she has located so far, so that we can compare those with what Corps provides; Follow up with Near Shore Science expert;	1.30 KGA
12/9/2013	Phone call with KGA on FOIA request;	.25 TWT
12/9/2013	Review response from Corps FOIA officer indicating that the Fee Waiver request is in their view inadequate; Responsive email with query about why it is allegedly inadequate and what additional information the Corps allegedly needs to process the FOIA; Follow up with L.H. and TWT on same; Review email from Corps FOIA officer with outline of current Seattle District Fee Waiver criteria; Briefly respond to same and begin drafting up outline of how CPPSH meets all criteria; Review email from Near Shore Science expert;	.95 KGA
12/13/2013	Email exchange; Review materials in preparation for conference with Near Shore expert; Conference with expert and KGA;	1.25 TWT
12/11/2013	Review email from L.H. to Coalition members with update on Near Shore Science expert, myself, and TWT, and an outline on next steps to address cumulative impacts; Multiple emails between Coalition members on same; Multiple scheduling emails with TWT and Near Shore Science expert to set up a conference call;	.65 KGA No Charge
12/12/2013	Additional emails with TWT and Near Shore Science expert to schedule conference call tomorrow;	.30 KGA No Charge

12/13/2013	Review L.H. email with info on gooey duck ban in China due to high metal content; Phone call with Near Shore Science expert and TWT to go over scope of work and literature review as well as data gap filling plan to help support cumulative impact comments to be submitted; Follow up with L.H. and C.P. with task outline for them to support same; Multiple emails with L.H. and TWT on same;	1.80 KGA
12/15/2013	Review email from L.H. to Near Shore Science expert with background studies and other information;	.30 KGA No Charge
12/16/2013	Email exchange with KGA on FOIA request;	.25 TWT
12/16/2013	Email to TWT about document review; Email to Corps FOIA officer about Fee Waiver info and about whether it can be transmitted by email;	.25 KGA
12/17/2013	Review email from FOIA officer confirming email transmission of Fee Waiver info is fine; Finalize and submit detailed outline by email to Corps FOIA officer of why Coalition meets Fee Waiver criteria; Follow up email to L.H. and C.P. on next steps for FOIA and putting together generic cumulative impact comment;	1.45 KGA
12/18/2013	Draft and submit another FOIA request to the Corps looking for specific NEPA documents (if any) beyond the Nationwide 2012 National documents and Regional documents; Submit same to permitting person; Follow up with L.H. on same;	.95 KGA
12/19/2013	Review email from Corps FOIA officer confirming receipt of additional FOIA request; Begin review documents and email from Corps FOIA officer with response to 12/3 FOIA request;	1.10 KGA
12/20/2013	Forward documents from Corps to L.H. and TWT; Confirm receipt of FOIA documents with Seattle FOIA officer;	.20 KGA No Charge
12/23/2013	Review email from L.H. about opinion piece in the Olympian News about shellfish toxin issues;	.25 KGA No Charge

1/2/2014	Review letter from Corps FOIA officer verifying there are no additional Corps NEPA cumulative impact documents; Email to L.H. and co-counsel with copy of same and brief thoughts on how this may help our potential challenge to NWP 2012; Finalize and file further FOIA request with Corps for key underlying documents relied on for prior cumulative impact conclusions; Forward same on to L.H./C.P.; Review email from L.H. with 41 page literature review on NWP 48 issues;	3.00 KGA
1/3/2014	Provide studies, Corp spreadsheets on permits status, and other key documents to Law Clerk along with directions on drafting detailed cumulative impact comments for future submission to Corps;	.50 KGA
1/10/2014	Review FOIA response from Corps.	.10 KGA
1/8-17/2014	Review all materials and consult with KGA; Extensive legal and factual research; Begin drafting legal Memo on potential way to get at issues; Begin drafting generic Cumulative Impact Comment for Coalition to use as base for site specific comments on NWP 48 authorizations; Edit and revise same as additional documents are reviewed;	17.80 Law Clerk
1/23-25/2014	Begin review of new SHB decision on Cumulative Impacts; Send to Law Clerk with thoughts on how it might relate to the generic Corps Cumulative Impact comment draft;	.35 KGA No Charge
1/25/2014	Email to L.H. with information on FOIA responses from Corp; Follow up with TWT on need for additional FOIA and WPRA request;	.70 KGA
1/25/2014	Review Tacoma Tribune article forwarded by L.H.;	.20 KGA No Charge
1/18-27/2014	Additional research on PVC toxicology and various legal issues; Additional drafting and editing on generic Cumulative Impact comment; Check with Center for Biological Diversity (CBD) for info they may have on cumulative impacts from shellfish aquaculture, per KGA direction; Provide first draft Cumulative Impact comment to KGA for review;	17.70 Law Clerk

1/28/2014	Begin review of draft generic Cumulative Impact Comment from Law Clerk; Follow up with Law Clerk on same;	.30 KGA
1/29/2014	Review press release from L.H. on efforts to try to stop eelgrass destruction by chemical spraying;	.20 KGA No Charge
1/30/2014	Review Shoreline Hearings Board decision in detail; Review new peer study on Japanese eelgrass; Review email from L.H.;	1.25 TWT No Charge
2/4/2014	Edit draft generic Cumulative Impact Comment from Law Clerk;	.20 KGA
2/5/2014	Further edits to draft comments;	.20 KGA
2/10/2014	Phone call with L.H. on status;	.25 TWT
2/10/2014	Provide follow up research questions to Law Clerk on Cumulative Impact related issues;	.40 KGA
2/12/2014	Review materials on “best available science” and Cumulative Impact legal research from Law Clerk; Further edits to draft Cumulative Impact Comment;	.15 KGA
2/13/2014	Collect and review all materials cited in draft generic Cumulative Impact comment; Send L.H./C.P. draft of generic comment with outline of strategy for use of same and all documents cited;	.50 KGA
2/14/2014	Review draft EIS permit and comments; Phone call to L.H.; Revise and finalize comments; Review KGA comments;	5.35 TWT
2/14/2014	Review L.H. responses on draft cumulative impact comments; Incorporate responses into current draft;	.50 KGA
2/20/2014	Review Imazamox materials:	.25 TWT No Charge
2/27/2014	Begin preliminary review of cumulative impact comments; Draft FOIA request;	3.00 TWT
2/27/2014	Review email from L.H. with information on DOE EIS on Imazamox spraying; Review email from L.H. on <i>Detienne</i> SHB Appeal;	.25 KGA No Charge

2/28/2014	Review Petition for Review; Phone call to L.H.;	.50 TWT No Charge
3/18/2014	Review email from L.H.; Review applicable WAC and make suggestions;	.75 TWT No Charge
3/18-20/2014	Review emails from L.H. about new Pierce County Shoreline Master Plan Amendments as a result of <i>Detienne</i> SHB win; Review email from L.H. with questions about application of WAC's and TWT's response with answer on WAC's;	.25 KGA No charge
3/25/2014	Telephone conference with L.H. on strategy, handling, and evaluation;	.75 TWT
3/25/2014	Review email from L.H. with WPRA to WDFW about shellfish aquaculture since 2008 (to try to determine if Corps number's on permit usage are wrong);	.10 KGA
3/26/2014	Review final EIS (preliminary); Email to KGA;	.25 TWT No Charge
3/26/2014	Review email from TWT about final EIS on Imazamox spraying in Willapa Bay;	.10 KGA No charge
4/2-3/2014	Review email from L.H. with DOE announcement of NPDES permit issuance for Willapa Bay Imazamox spraying; Provide quick answer to L.H. on PCHB permit Appeals process; Review response from L.H.; Review TWT follow up on same issue and L.H. response;	.75 KGA No Charge
4/12/2014	Review request from TWT about toxicologist and herbicide spray experts; Respond with contact information for at least one possible expert;	.10 KGA No Charge
4/14/2014	Research to locate information on additional potential toxicology experts; Follow up emails to TWT with two other potential options and my thoughts on potential issues with each;	.75 KGA No charge
4/21/2014	Review L.H. questions and update from Seattle District about number of NWP 48 permits already issued and the "local" analysis allegedly underway; Provide advice on requesting additional files from Corps;	.75 KGA

4/22/2014	Review email from L.H. with the <i>Detienne</i> SHB Appeal and questions posed by co-counsel about representation on same; Review responses from L.H.; Multiple emails exchanged with L.H. and TWT on scheduling of conference call;	.50 KGA No Charge
4/24/2014	Multiple additional scheduling emails for conference call; Review NRDC spray drift guidance comments to EPA; Forward same to L.H. and co-counsel in case they are relevant to Imazamox PCHB Appeal;	.50 KGA No Charge
4/25/2014	Prepare and attend meeting with KGA and L.H. on strategy; Review email from Corps;	1.50 TWT
4/25/2014	Review material to prepare for conference call with TWT and L.H. to discuss strategy on NWP 48 registrations, Individual permits, FOIA issues, and new studies that may be helpful; Participate in conference call and provide advice on various issues; Review email to TWT by Corps FOIA officer;	1.50 KGA
5/1/2014	Confer with KGA on Willapa Bay issues;	.75 TWT No Charge
5/1/2014	Strategize with TWT on potential theories and types of expert declarations needed to challenge DOE Willapa Bay NPDES Permit for herbicide use on Japanese eelgrass, and what would be necessary to try to obtain to Stay from PCHP;	.75 KGA No Charge
5/2/2014	Phone call to expert toxicologist; Begin work on Motion for Stay;	.50 TWT No Charge
5/2/2014	Review press release from L.H. about Coalition Appeal of DOE NPDES spraying permit;	.10 KGA No Charge
5/14/2014	Review draft Declaration by expert in support of PCHB spray permit Appeal; Provide thoughts and advice on same;	.15 KGA No Charge
5/14/2014	Review follow up email from L.H. with her notes from recent discussion with Corps about NWP 48 and questions on how to proceed;	.10 KGA
5/20/2014	Review email from L.H. with new Pierce County Appeal for 15 acre aquaculture project;	.10 KGA No Charge

5/21/2014	Review email from L.H. with questions about Corps cumulative impact documents; Respond with key NWP 48 decision documents (both National and Seattle District level) including specific cites to key pages/paragraphs;	.40 KGA
5/22-23/2014	Review emails from L.H. with additional questions on SEPA vs. NEPA, and press releases from shellfish Industry and NMFS; Respond to same;	.60 KGA No Charge
6/3/2014	Review L.H. FOIA to Corps for six different permit files per our discussion;	.10 KGA
6/12/2014	Additional legal research on whether there are any alternative ways to challenge NWP 48 registrations;	.75 KGA
7/1/2014	Review L.H. 6/17/2014 email about pending aquaculture cites and Corps process issue; Provide outline of thoughts and advice on same and some of prior questions;	.75 KGA
7/8/2014	Review emails from L.H. and C.P. on south Puget Sound Orca Pod issues; Review expert comments on same:	.25 KGA
8/7/2014	Phone conference with L.H., to provide advice on various issues; Review email from L.H. with <i>Haley</i> proposed site visit Release; Review proposed Release;	.75 KGA No Charge
8/8/2014	Email exchange with and letter to L.H. with legal opinion on proposed Release;	1.00 KGA No Charge
8/8/2014	Review and edit updated draft Generic Coalition NWP 48 comments to Corps;	.25 KGA
8/9-12/2014	Finalize generic NWP 48 comments to Corps; Send to L.H. with detailed instructions; Send key attachments to L.H.;	3.75 KGA
8/12/2014	Emails and phone call with client attorney G.L. about Thurston County Appeal of Industry SHB decision; Preliminary legal research on cost issues;	.25 KGA No Charge
8/13-14/2014	Legal research on cost/fee issue in Thurston County; Memo to KGA on same;	4.75 Law Clerk No Charge

8/13/2014	Review Thurston County Petition for Review; Review law clerk Memo on costs; Phone conference with TWT on same; Letter to L.H. outlining thoughts and advice on how to proceed on that case; Multiple emails and phone calls with client attorney G.L. on same;	1.15 KGA No Charge
8/14/2014	Phone conference with L.H. to provide rough estimate of hours for Corps NEPA/CWA suit on NWP future 48 registrations and thoughts on next steps;	.60 KGA No Charge
8/26/2014	Review email from and provide advice to attorney G.L. about possible dismissal in Thurston County case;	.10 KGA No Charge
9/2-3/2014	Review multiple L.H. emails about various efforts by Industry and various issues that may come up in the Pierce County/Haley HE case; Outline some issues for L.H., and provide brief thoughts on each; Draft Pre-Hearing Brief insert that addresses the "Improper Reliance on Corps NEPA" issues; Forward to L.H. for potential use in her briefing;	1.40 KGA No Charge
9/4/2014	Further research on Seattle District NWP permit re-issuance or renewal process;	.55 KGA
9/5-7/2014	Legal research and drafting of Complaint;	6.50 Law Clerk
9/8/2014	Review draft expert report; Review email from L.H. on Pierce County Haley Hearing; Respond to same; Review email from KGA;	1.00 TWT No Charge
9/9/2014	Review news article on Shellfish Initiative forwarded by client rep L.H.; Provide thoughts on "right to farm" ordinances and constitutionality issues that might come up;	.50 KGA No Charge
9/11/2014	Review additional new clippings from Bainbridge paper forwarded by client rep L.H.;	.10 KGA No Charge
9/15/2014	Review emails from L.H. and respond to same; Review SEPA/NEPA page and confer on same;	2.00 TWT No Charge
9/15/2014	Review long email from L.H. about various Pierce County Appeal issues and the Shellfish Initiative; Provide detailed feedback on various SEPA and other related issues; Review similar related feedback to L.H. from TWT;	1.00 KGA No Charge

9/15/2014	Begin review of draft Complaint forwarded by law clerk;	.50 KGA
9/18-19/2014	Review 22 page propaganda letter from shellfish lawyers about the "Initiative"; Review TWT thoughts on same; Review follow up emails from L.H. on same;	.50 KGA No Charge
9/19/2014	Review email from L.H. with 22 page letter; Respond to same;	1.50 TWT No Charge
9/26/2014	Additional work on draft Complaint; Outline additional research questions for law clerk;	.75 KGA
9/29-10/16/2014	Additional research and drafting on CWA claims for Complaint; Provide same to KGA;	5.90 Law Clerk
10/16/2014	Review CWA related materials provided by law clerk;	.50 KGA
10/17/2014	Review Notice of Proposed CWA Rule making on definition of "waters of the state" forwarded by L.H.;	.25 KGA No Charge
11/2/2014	Review detailed information email to a wide group of folks by L.H., with geoduck aquaculture information;	.25 KGA No Charge
12/2/2014	Review information from TWT on Willapa Bay herbicide spraying; Work to organize more comments from other conservation groups on same;	.50 KGA No Charge
12/7/2014	Additional legal research on suits against the Corps that have been successful (or not);	.50 KGA
12/8/2014	Additional research on same;	.25 KGA
12/14/2014	Begin to revise draft Complaint in light of research results;	.25 KGA
12/18/2014	Revise/edit draft Complaint;	.75 KGA
12/22/2014	Phone call from L.H. on status and handling;	.25 TWT No Charge
12/22/2014	Further edits to draft Complaint;	.75 KGA

1/5/2015	Additional revisions to draft Complaint;	.50 KGA
1/6/2015	Send revised draft Complaint to client reps and co-counsel with outline of some of the issues; Task law clerk with additional legal research on CWA & NEPA issues;	1.00 KGA
1/6/2015	Task law clerk with legal research on possible ESA §7 & §9 60 Day Notice issues;	.50 KGA No Charge
1/6-10/2015	Legal research on NEPA issues; Follow up research on NWP 48; Review all case law on Corps NWP's; Lengthy Memo to KGA on NEPA issues;	33.80 Law Clerk
1/11-25/2015	Begin research on and drafting of 60 Day ESA Notice to Corps; Meetings with KGA to discuss research; Draft and send to KGA ESA 60 Day Notice for review;	10.00 Law Clerk No Charge
1/7/2015	Confer with L.H. and KGA on cumulative impacts and Corps;	1.00 TWT
1/7/2015	Phone call with L.H. to discuss Cum. Impact claim against Corps; Phone call with TWT on tactical issues for Cum. Impact suit; Revise draft Complaint, to create one version with ESA claims and one without; Phone call with client rep N.Q. about preparing and filing Cum. Impact Comments; Multiple emails to N.Q. with additional supporting documents and updated Comment draft;	2.75 KGA
1/7-8/2015	Phone call with L.H. on <i>Haley</i> SHB Appeal, strategies for bringing more pressure to bear on Counties, etc; Begin review of email from L.H. with NMFS <i>Haley</i> Comment letter, as well as grower brief and Pierce County HE Decision in <i>Haley</i> case;	1.75 KGA No Charge
1/9/2015	Review various materials from L.H. including PVC tube loss log;	.75 KGA
1/10/2015	Draft additions for Cumulative Impact Comment related to NMFS letter and PVC tube loses Send revised Comment to client reps and co-counsel;	2.25 KGA
1/11/2015	Respond to L.H. email about setting up a conference call to discuss <i>Haley</i> SHB arguments;	.50 KGA No Charge

1/12/2015	Review emails from KGA and revise draft comment;	.50 TWT
1/12/2015	Phone call with Corps on NMFS ESA Section 7 consult issues and how that relates to Cumulative Impact; Review law clerk research on NEPA, CWA and other NWP issues;	.50 KGA
1/12/2015	Additional legal research on Section 9 ESA Notice issues;	.25 KGA No Charge
1/14/2015	Additional review of <i>Haley</i> SHB appeal materials; Long conference call with L.H. to discuss strategy and tactics for SHB appeal; Review materials sent by TWT in Eelgrass herbicide spraying permit challenge;	4.00 KGA No Charge
1/15/2015	Phone call with L.H. on next steps in Corps Cumulative Impact claim; Review email from N.Q. about Corps Cumulative Impact comments; Respond to same;	.75 KGA
1/16/2015	Provide thoughts to TWT on Eelgrass herbicide spraying issue;	.75 KGA No Charge
1/22-23/2015	Additional NEPA research provided to TWT for Eelgrass herbicide spraying permit case; Begin review of draft 60 day ESA Notice to Corps forwarded by law clerk;	.75 KGA No charge
1/24/2015	Email exchange with co-counsel on possible RCRA claim for lost geoduck tubes and issues that would arise in same;	.25 KGA No Charge
1/27/2015	Review email from KGA on new USCOE directive;	.25 TWT
1/27/2015	Review agency information packet forwarded by L.H.; Provide advice on same;	.25 KGA
2/1-3/2015	Further legal research on NWP and Corps permit challenges; Begin summarizing all cases located;	13.03 Law Clerk
2/4-6/2015	Additional legal research on NWP and Corps permit challenges; Continue summarizing cases; Begin draft Memo for KGA on same;	18.07 Law Clerk
2/7-8/2015	Finish summarizing all cases; Further edits to Memo for KGA on same;	9.70 Law Clerk

2/4-9/2015	Multiple email exchanges with law clerk on NWP research and drafting;	.50 KGA No Charge
2/10/2015	Review materials from L.H.; Email exchange on same;	.50 TWT No Charge
2/10/2015	Review email from L.H. about Declaration to be used in Haley Permit SHB appeal; Complete Declaration review/make edits; Send same to L.H.;	1.75 KGA No Charge
2/11/2015	Follow up email to N.Q. on status of Biological Evaluations (BE) for NWP 48 and other similar operations sought from DOE and Corps; Review email from N.Q. with answers on same; Review follow up email from N.Q. with BE's from DOE; Forward same on to law clerk;	.50 KGA
2/13/2015	Review email from L.H. asking what laws apply to Declarations and how they are related to the SHB appeal; Provide citations to SEPA statute and rules, along with link to DOE SEPA handbook;	.25 KGA No Charge
2/24/2015	Review draft Petition for Suspension of NWP 48;	1.25 TWT
2/15-16/2015	Edit draft 60 Day ESA Notice;	1.50 KGA No Charge
2/17/2015	Phone call from L.H.;	.25 TWT
2/18-19/2015	Provide draft 60 Day Notice to L.H. with thoughts on same; Follow up with law clerk on various issues including Petition to Suspend;	1.50 KGA No Charge
2/16-19/2015	Draft Petition to Suspend NWP 48 in Puget Sound;	10.00 Law Clerk
2/20/2015	Review thoughts from TWT on ESA issue; Provide follow up advice on related issues;	.25 KGA No Charge
2/23/2015	Revise 60 Day ESA Notice; Provide copy to L.H./C.P. along with further thoughts on strategy issues;	.50 KGA No Charge
2/23/2015	Review email from N.Q. with more potential cumulative impact related supporting documents; Follow up questions to N.Q. on same;	.25 KGA

2/21-22/2015	Continue to draft Petition to Suspend NWP 48 in Puget Sound; Check all literature and authority on same;	3.30 Law Clerk
2/24/2015	Conference with L.H.;	1.00 TWT
2/24/2015	Review draft Petition for Suspension of NWP 48;	1.25 TWT
2/25/2015	Review draft Petition for Suspension of NWP 48 in Puget Sound from law clerk; Multiple email exchanges with law clerk on same;	2.75 KGA
2/25/2015	Additional drafting of Petition to Suspend NWP 48 in Puget Sound; Send to KGA;	6.85 Law Clerk
2/26/2015	Discussion with KGA about updating/revising Petition and additional research for Petition;	2.00 Law Clerk
2/26/2015	Review email from L.H. about possible phone discussion with expert witnesses and request for citations on cumulative impact requirements in SEPA; Legal research to update case law and materials on same; Provide detailed email to L.H. with advice and citations on SEPA cumulative impact issue;	2.00 KGA No Charge
2/26/2015	Review messages from KGA and send information on cumulative impact;	.50 TWT
2/26/2015	Review co-counsel's cumulative impact material; Provide additional advice on same;	.75 KGA
2/27/2015	Review additional documents cited by law clerk in draft Petition to suspend; Additional edits to draft Petition for Suspension of NWP 48; Edit draft Complaint against Corps; Ask law clerk for additional research and drafting on same; Provide draft Petition for Suspension to L.H./C.P. with advice on strategy for use of same;	1.00 KGA
2/28/2015	Email to L.H. on possible WPRA requests on 401 Certification issues; Review response;	.50 KGA No Charge
3/5/2015	Email exchange with KGA on injunctive relief prospects;	.50 TWT

3/5/2015	Review email from TWT with question about CWA and possibility of seeking injunction this year; Review email from L.H. about plastics and other issues; Review email from N.Q. about Corp FOIA and DOE WPRA's;	.50 KGA
3/10/2015	Review Pierce County SMP and SMA on cumulative impacts; Conference with KGA on same;	1.50 TWT No Charge
3/10/2015	Review email from L.H. on post hearing briefing in <i>Haley</i> permit SHB appeal; Phone conference with TWT on same; Detailed email to L.H. with advice on same;	1.50 KGA No Charge
3/11/2015	Review multiple additional emails from L.H. on Post Hearing Brief issues; Lengthy phone call with L.H. on same; Provide ideas on Post Hearing Brief language for use with argument about lame permittee expert; Legal research on SEPA and SMA cumulative impact requirements; Provide concise summary of both SEPA & SMA cumulative impact standard; Review PCC Title 18; Outline County modification rights; Send materials to L.H.;	5.75 KGA No Charge
3/11-14/2015	Revise draft Federal Court CWA/NEPA Complaint; Legal research on same; Further legal research on NEPA and Corps issues; Conferences with KGA about same;	17.70 Law Clerk
3/12/2015	Multiple conferences with law clerk about Complaint revisions and legal research issues;	.25 KGA
3/13/2015	Further conference with law clerk about Complaint review;	.50 KGA
3/16/2015	Phone call with L.H. on status;	.25 TWT
3/17-18/2015	Email exchange with L.H. about Taylor/County Post Hearing Briefs in <i>Haley</i> case; Review Briefs; Legal research on issues raised in same; Draft portions of Reply Brief for use by L.H.; Send same to L.H.;	4.75 KGA No Charge
3/18-19/2015	Additional legal research on CWA/NEPA issues; Revise Complaint to include challenges to NWP 48 nationally as well as regionally; Review National and Regional NWP 48 docs for any "re-opener" clauses; Report to KGA on same;	13.20 Law Clerk

3/19/2015	Review Reply Brief submitted by L.H. in Land Use Case; Provide suggestions on correction of formatting in same; Review email from L.H. about Industry hiring a DC lobbying firm;	.30 KGA No Charge
3/19/2015	Review KGA suggested <i>Haley</i> Reply Brief;	.25 TWT No Charge
3/19/2015	Review new NEPA case from 9 th Circuit; Forward same on to law clerk;	.25 KGA
3/20-23/2015	Check all citations in legal memos; Additional legal research to support Complaint; Revise Complaint; Finalize revised draft Complaint and send to KGA for review;	14.60 Law Clerk
3/24-26/2015	Review follow up email from TWT about possible CWA suit to stop additional spraying in Willapa Bay; Review TWT email to L.H. about same; Provide detailed analysis to co-counsel on my thoughts about the likelihood of getting injunction from Superior Court or Federal Court given nature of General Permit;	1.00 KGA No Charge
3/26/2015	Review new opinion from District Court in Tenth Circuit on NEPA issues under an NWP;	.25 KGA
3/29/2015	Begin review of revised draft Complaint provided by law clerk;	.25 KGA
3/30/2015	Continue review of draft Complaint;	.25 KGA
4/1-2/2015	Continue review of revised draft Complaint;	.50 KGA No Charge
4/3/2015	Outline for L.H./C.P. the 13 various outstanding issues I know of and inquire about status of same;	1.00 KGA
4/5/2015	Review emails from C.P. & L.H.; Follow up with L.H. on <i>Detienne</i> win in Superior Ct.;	.45 KGA No Charge
4/6/2015	Phone call with L.H. about the outstanding issues and sequence of events necessary to file suit; Email to L.H. with re-draft of Petition for Suspension; Follow up email to N.Q. with outline of docs and FOIA's needed; Finish organizing and reviewing documents cited in Petition;	1.80 KGA

4/7/2015	Review multiple emails from L.H. & N.Q. on document issues; Review email with supplemental documents proposed for filing with Corps; Begin review of those docs;	1.40 KGA
4/7/2015	Follow up with law clerk on 401 Cert. FOIA;	.10 KGA No Charge
4/12/2015	Review ESA Complaint additions from law clerk; Edit same;	.50 KGA No Charge
4/13/2015	Review Corps FOIA related emails from N.Q. and L.H.; Respond to same with advice on how to proceed;	.25 KGA
4/11-12/2015	Edit Complaint draft to create ESA claims that can be easily inserted after NEPA/EWA court case is underway;	1.50 Law Clerk No Charge
4/14/2015	Edit revised Complaint; Review Burley Lagoon Corps Document's from N.Q.; Follow up with N.Q. on same; Brief review of Verification/permit letters sent by N.Q. for Burley project;	1.50 KGA No Charge
4/16/15	Review email from L.H. about HCP issues; Review email from L.H. about UW paper; Follow up with L.H. on UW paper;	.75 KGA No Charge
4/17/2015	Provide advice to L.H. on ESA "Take" issues; Provide direction to law clerk on further draft Complaint research if we decide to add ESA claim;	.50 KGA No Charge
4/17/2015	Provide additional PDF's that were referenced in the Petition to Suspend to L.H./C.P./N.Q. along with advice on what to include in additional comments;	.25 KGA
4/19-23/2015	Edit draft Complaint to condense and better allege major Federal action;	2.60 Law Clerk
4/21/2015	Review media release from L.H. on <i>DeTienne</i> Superior Court win;	.10 KGA No Charge
4/23/2015	Review revised draft NEPA/CWA Complaint against Corps from law clerk;	.50 KGA
4/27/2015	Phone conference with L.H. on Petition to Suspend and other issues;	.50 KGA

4/28-29/2015	Draft press release to go with Petition for Suspension; Send same to L.H./C.P. and co-counsel;	.50 KGA No Charge
4/30/2015	Review news articles on Willapa Bay spraying;	.15 KGA No Charge
4/30/2015	Begin review of edits to Petition to Suspend proposed by L.H.;	.60 KGA
5/1/2015	Review draft Petition to Suspend;	.50 TWT
5/1/2015	Complete review of Petition edits; Revise and send L.H. with instructions;	.50 KGA
5/4/2015	Phone call to L.H. on status;	.50 TWT
5/6/2015	Phone call from L.H. on status;	.50 TWT
5/7/2015	Phone call from client; Review email from client;	.25 TWT
5/14/2015	Organize file, resource materials, and notebook;	7.40 Paralegal
5/15/2015	Finish file organization;	4.60 Paralegal
5/18/2015	Revise draft Complaint against Corps; Send to L.H./C.P. and co-counsel for review;	1.35 KGA
5/19/2015	Review client rep F.W. questions about need to correct labels on two key maps; Respond to same with advice on submission of corrected Petition CD;	.60 KGA
5/20/2015	Review letter from L.H. on <i>Haley</i> result; Respond to same;	.25 TWT
5/20/2015	Review draft Complaint from KGA;	.50 TWT
5/20/2015	Phone call and emails with client rep F.W. about 51 doc Cumulative Impact CD and map labels on same;	.50 KGA No Charge
5/20/2015	Review email from L.H. with the <i>Haley</i> SHB decision; Respond briefly to email; Review email from N.Q. with status update on Padden Permits; Provide advice to N.Q. on Padden Permit and additional FOIA's;	.75 KGA No Charge

5/21/2015	Review email from F.W. about how to do the correction of maps in document #33 on the CD; Provide additional advice on same;	.25 KGA No Charge
5/22/2015	Review <i>Haley</i> decision; Email exchange with L.H.;	1.00 TWT No Charge
5/25/2015	Review follow up email by F.W. about next steps in Corps process; Review L.H. follow up questions; Respond to both;	.25 KGA
5/26/2015	Review KGA's analysis of SHB documents;	.25 TWT No Charge
5/26/2015	Review email string with TWT thoughts on appeal options on <i>Haley</i> SHB decision and L.H. questions on same; Review <i>Haley</i> SHB decision; Provide advice on appeal options;	.70 KGA No Charge
5/27/2015	Email exchange with L.H.;	.25 TWT
5/27/2015	Provide advice to L.H. on next steps in Corps NWP 48 challenge process; Review L.H. detailed follow up questions; Respond to same;	1.00 KGA
5/28/2015	Review Petition to Suspend;	.50 TWT
5/29/2015	Phone call with L.H. to discuss Corps meeting request and other issues, including updates to generic Cumulative Impact comments to Corps; Review L.H. email to Corps about setting up a 6/24 meeting;	2.75 KGA
5/31/2015	Review SHB decision on 5 year permit issue and related statutes and rules; Provide advice to L.H. on same;	.50 KGA No Charge
6/2/2015	Phone call with L.H. on upcoming cumulative impact related meeting with Corps, and ideas for revised cumulative impact comment letters to the Corps;	.70 KGA
6/2-4/2015	Review email inquiry from Center for Food Safety (CFS); Respond to same; Phone call with CFS staff attorney on NWP 48 issues;	.50 KGA No Charge
6/5/2015	Phone call with L.H. about CFS inquiry status of updated cumulative impact letter, and plan for Corps meeting; Review email from L.H. on eelgrass issue;	.50 KGA

6/10-12/2015	Review multiple emails exchanges with plastics expert about Industry; Provide advice on same;	.15 KGA No Charge
6/13/2015	Review of revised draft Cumulative Impact letter to Corps provided by L.H.; Emails with L.H. about edits to same;	.60 KGA
6/22/2015	Review N.Q. email with additional JARPA's and new "pending permits" list from Corps; Review Meeting Agenda from Corps; Follow up with L.H. on same;	.50 KGA
6/23/2015	Review additional comments filed by L.H. with Corps; Provide feedback on same; Review updates from N.Q. on additional FOIA sent out for project that has dropped off list and new Corps pending project list;	.25 KGA
6/23/2015	Follow up with CFS and provide more NWP 48 documents to them; Review thoughts from CFS attorney on some of the ESA legal issues;	.50 KGA No Charge
6/24/2015	Prepare for and attend meeting with Corps; Debrief with various client reps thereafter; Provide advice on how to continue commenting and raising key issues without incurring substantial additional expert costs; Provide advice on how to monitor and turn in violations to Corps once permits are issued; Outline notes taken during Corps meeting and create "homework" list; Provide "homework" list to L.H.;	4.75 KGA
6/25/2015	Follow up with CFS, to summarize Corps meeting and provide mussel study link; Review CFS email about their proposed ESA related FOIA's to Corps/NMFA; Provide advice on same;	1.50 KGA No Charge
6/26/2015	Review article forwarded by L.H. on shore armoring petition by EarthJustice; Provide thoughts on same; Follow up with EarthJustice on same; Review L.H. email confirming that <i>Haley</i> permit was issued in March; Provide advice on FOIA and other related issues;	.50 KGA No charge
6/28-29/2015	Review email from L.H. with shellfish farm acreage tables; Provide advice on use of same; Draft language on baseline and shellfish farm acreage issues to add to generic Coalition Cumulative Impact comment; Multiple email exchanges with L.H. on how and where to add language to Cumulative Impact comments to make them more persuasive;	1.75 KGA

6/29/2015	Meeting with CFS to discuss Puget Sound shellfish ESA issues related to shellfish;	.125 KGA No Charge
7/1/2015	Review plastics research forwarded by client rep M.G.; Forward same to L.H.;	.10 KGA
7/6/2015	Multiple emails exchanged with CFS about their ESA related FOIA's to USFWS, NMFS, and the Corps;	.125 KGA No Charge
7/17/2015	Review N.Q. email with information on <i>Arcadia</i> permit; Provide quick advice on what to ask Corps in follow up on same; Review N.Q. follow up to Corps;	.25 KGA No Charge
7/28/2015	Review additional N.Q. follow up emails, including note indicating <i>Arcadia</i> was not one of the permits we filed Cumulative Impact comments on;	.10 KGA No Charge
7/30/2015	Review L.H. email about Review possible draft Complaint from KGA draft joint Conservation Group letter to congressional delegation on Puget Sound shellfish issues;	.10 KGA No Charge
8/13/2015	Review L.H. email on habitat issues; Respond to same; Review TV and newspaper coverage obtained by L.H. on shellfish spraying issues; Provide feedback on same;	.25 KGA No Charge
8/17-18/2015	Review final letter from Conservation Groups to congressional delegation about shellfish aquiculture issues; Review multiple CFS emails about results of FOIA's to USFWS, NMFS, and Corps on NWP 48 ESA consultation related issues; Respond to same;	.50 KGA No Charge
8/18/2015	Follow up with L.H. and co-counsel on the information CFS obtained so far that we can potentially use in our NWP case;	.20 KGA
8/19/2015	Review L.H. email confirming so far no permits on which we filed Cumulative Impact comments have been issued by Corps;	.10 KGA
8/20/2015	Review TWT emails to CFS about ESA issues;	.10 KGA No Charge

8/30/2015	Review CFS's follow up email about ESA consultation issue and FOIA results; Respond to same; Review CFS confirmation that Corps and NMFS statements on whether there is an ongoing ESA consultation that covers NWP 48 are inconsistent;	.40 KGA No Charge
8/30/2015	Follow up with L.H. on status of most recent N.Q. FOIA to Corps, about update list of NWP 48 permits issued and pending;	.10 KGA
9/2/2015	Follow up with L.H. on status of 6/25/15 "homework" list;	.10 KGA
9/9/2015	Review email from L.H. with questions about last billing statement; Respond to same; Review email from CFS on what they have obtained from NMFS on recent FOIA request; Follow up email with CFS; Forward same to L.H.; Review response from CFS (indicating some NWP 48 coverage is actually discussed); Review CFS email with 2014 NMFS BiOp on programmatic consultation; Review CFS questions on same; Provide answers on same;	1.25 KGA No Charge
9/9/2015	Review email from L.H. about another Corps NWP 48 permit that was issued and various questions from N.Q.; Provide advice on same;	.75 KGA
9/10/2015	Review CFS obtained documents in more detail; Follow up with CFS on the YGBFKM email from NMFS employee; Review follow up email from TWT on same;	1.25 KGA No Charge
9/22/2015	Review L.H. email with Coalition comments sent to the Corps on <i>Haley</i> permit, and information on FOIA issues; Review Corps <i>Haley</i> Decision Documents; Provide advice on how to deal with FOIA issues at the Corps; Email to L.H. with thoughts on Corps <i>Haley</i> documents;	1.15 KGA No Charge
9/22/2015	Review L.H. email with information on Mason County NWP 48 permits,	.10 KGA
9/30/2015	Review L.H. comments on Mason County NWP 48 permit; Provide brief feedback on same;	.25 KGA
9/30/2015	Review L.H. email about whether to sue now or wait for more permits with detailed comments in the Record like this one; Respond with advice on same;	.20 KGA

10/1/2015	Review CFS email indicating NMFS says there are no responsive documents that provide individual ESA Concurrence letters (even though we already have examples of some of those); Respond to same;	.25 KGA No Charge
10/2/2015	Review L.H. letter to Secretary of Commerce on need for draft condition #7 in draft programmatic BA; Provide advice on same;	.10 KGA No Charge
11/3/2015	Phone call with L.H. to go over most recent information from Corps, status of draft NMFS Programmatic Consultation conditions that may effect NWP 48 case, EPA comment on same, etc; Provide advice on same; Draft and send language to L.H. for addition to Comment letter on NWP 48 "Special Condition" issues;	1.75 KGA
11/3/2015	Also provide outline of what Request for Revocation of <i>Haley</i> permit should say, given lack of special condition and potential sand dollar non-disclosures by applicant;	.40 KGA No charge
11/8-10/2015	Review L.H. email on her FOIA to Corps about EPA letter and related documents; Review Corps FOIA documents with EPA June 2015 comment on draft condition #7 and Industry response to our Petition to Revoke NWP 48 in Puget Sound; Outline thoughts on response to same;	.75 KGA
11/14/2015	Review email from N.Q. with updated Corp's NWP 48 permit spread sheet; Follow up questions to N.Q. on same;	.25 KGA
11/17-18/2015	Review L.H. letter to NMFS on Programmatic ESA Consultation; Review updated supporting documents; Email exchange on same;	.25 KGA No Charge
11/19-20/2015	Review email from CFS with FOIA documents on ESA issues; Review TWT response on same;	.25 KGA No Charge
11/19-20/2015	Review L.H. email to Corps with enforcement request; Review Corps Response; Provide advice on same;	.10 KGA No Charge
12/14/2015	Review Mason County Wilson-Leroy permit comments, forwarded by L.H.;	.10 KGA No Charge
12/14/2015	Follow up with L.H. on Corps decision documents on other permits;	.15 KGA

12/22-23/2015	Review PDX Dist 2007 Bi-Op documents forwarded by L.H. and compare to Puget Sound BiOp;	.90 KGA No Charge
1/3/2016	Skim emails from L.H. with DOE Guidance and SeaGrant Report;	.25 KGA No Charge
1/5/2016	Phone call with L.H. on NWP 48 challenge strategy issues;	.50 KGA
1/26/2016	Review Coalition letter to USFWS, NMFS and EPA about cumulative impact issues;	.10 KGA
3/29/2016	Review L.H. email about Chef Forum events on aquaculture in Seattle; Respond to same;	.15 KGA No Charge
3/29/2016	Review L.H. email about Corps invite to "next NWP 48 permit" informational meeting; Provide advice on same;	.15 KGA
4/13/2016	Review inquiry from L.H. about Corps 4/20 Informational Meeting on future of NWP 48; Provide thoughts and detailed outline of 12 specific questions to try to ask - if given time;	.50 KGA
4/20/2016	Review PowerPoint materials provided by L.H. that were used by Corps in 4/20 presentation; Provide advice on potential issues and questions that those materials suggest;	.75 KGA
4/22/2016	Phone conference with L.H. with discuss what happened at Corps 4/20 meeting and strategize about how to further address NWP 48; Follow up with law clerk on various issues;	1.25 KGA
4/26/2016	Review email from L.H. to NMFS and USFWS about plastics issue for Programmatic Shellfish ESA consultation;	.10 KGA No Charge
4/28/2016	Begin review of NWP 48 Arcadia Point Seafood (Wilson Leroy) file forwarded by L.H.; Begin review of Arcadia Point (DNR) file forwarded by L.H.; Review L.H. email summarizing which permits have been issued after receipt of Coalition Cumulative Impact comments; Review email from L.H. with Corps decision documents that include herring condition; Review Corps FOIA response on plastics marking issues provided by L.H.;	.45 KGA

4/29/2016	Begin review of email from L.H. about Corps not requiring NMFS recommended conditions; Begin review of Ecology SMP Handbook, Chapter 16 cumulative impact decisions;	.30 KGA No Charge
5/4/2016	Review permitting strategy doc's and summary of current pending Applications;	.25 KGA
5/11/2016	Meet with law clerk and outline updates to Complaint and research needed; Follow up phone call with law clerk on results of research to date;	.75 KGA
5/16-18/2016	Update case law and review documents; Memo to KGA on same;	15.00 Law Clerk
5/18/2016	Phone call with TWT; to update him on current situation; Multiple email exchanges with law clerk; Begin review of new case law and updated Memo provided by clerk;	1.25 KGA
5/18/2016	Phone call with KGA on status;	.75 TWT
5/19/2016	Begin review of forwarded file from L.H. on additional project that was recently approved under NWP 48;	.25 KGA
5/19-20/2016	Edit Complaint; Review additional permit files from N.Q. and L.H.;	9.50 Law Clerk
5/20/2016	Follow up on most recent email from L.H. with DOE SMP Handbook information;	.25 KGA No Charge
5/23/2016	Create Exhibit A to the Complaint using Corps informal meeting PowerPoint; Draft additional language for Complaint on same; Follow up with law clerk; Begin review of revised Complaint;	.75 KGA
5/23-25/2016	Additional legal research and drafting on Complaint and supporting Memo;	14.50 Law Clerk
5/24/2016	Review most recent (4/1816) Corps pending permit spreadsheet sent by L.H.; Create Exhibit B of the Complaint from Corps spread sheet;	.75 KGA
5/25/2016	Additional Complaint edits; Phone call with law clerk; Review L.H. email on the "withdrawn" permits; Provide advice on additional FOIA's related to same;	1.00 KGA

5/26/2016	Additional legal research on prior NWP litigation successes and failures in other parts of the US; Begin review of revised draft Complaint I provided by law clerk; Review N.Q. email to Corps on meaning of highlighting in Pending Permit list obtained under FOIA; Follow up with L.H. and provide advice on possible comments on 2017 NWP 48 both Nationally and on Regional Conditions;	3.95 KGA
5/26-31/2016	Additional work on Complaint edits, and document review;	15.00 Law Clerk
5/27/2016	Additional legal research on Complaint issues; Follow up with law clerk on same;	.50 KGA
5/31/2016	Additional Complaint edits; Review L.H. email about possible press release; Provide draft Complaint and both exhibits to L.H. and with advice;	1.75 KGA
6/1/2016	Review draft Complaint;	1.00 TWT
6/1/2016	Additional editing on Complaint; Provide follow up revised copy of Complaint to and L.H. along with detailed advice on some of the issues that I suspect will come up in the case; Review email from co-counsel on standing issues;	1.75 KGA
6/2/2016	Revise draft Complaint;	1.50 TWT
6/3/2016	Continue review and editing of Complaint;	1.50 TWT
6/2-3/2016	Follow up research on SHB decisions summarized in DOE SMP Handbook; Provide research direction to law clerk on same; Draft Press Release; Forward draft Press Release to TWT and L.H. for review;	1.95 KGA No Charge

6/6/2016	Review Complaint edits from TWT; Review edited Press Release from TWT; Phone call with L.H. to discuss Standing Declarants and likely intervenor issues; Further research on number of permits actually issued, and when; Revise Complaint; Review emails from N.Q. confirming Corps has no understanding of why the yellow highlighting is part of their own spreadsheet on pending projects; Send law clerk Memo on case law to co-counsel; Review materials on draft 2017 NWP 48 comment period located by law clerk; Forward same to L.H./C.P. with advice; Email exchanges with law clerk;	2.85 KGA
6/7/2016	Additional Complaint edits; Review email from L.H. with new Corp FOIA response and additional permit; Edit Press Release; Send same to L.H. and co-counsel; Send revised Complaint to co-counsel and L.H. with advice and questions about number of Corps permits issued under 2007 NWP 48 verses 2012 NWP 48; Follow up email with L.H. and co-counsel about 2014 email from Corps listing 990 project areas - rather than 920 listed in 2016 Corps Power Point;	2.75 KGA
6/7/2016	Phone call with CFS attorney to discuss commenting on draft 2017 NWP 48; Follow up email exchange with CFS attorney on same; Review and respond to follow up email from CFS and co-counsel about draft 2017 NWP 48; Forward documents on draft 2017 NWP 48 to other conservation groups to see if they are interested in participating;	1.75 KGA No Charge
6/7/2016	Review Complaint; Review press release; Review 2017 NWP 48;	2.00 TWT
6/8/2016	Phone call with CFS attorney about intervention, verses amicus, verses separate suit; Emails with CFS attorney on same;	1.15 KGA No Charge
6/8/2016	Phone call with L.H. to determine outcome of her recent phone call with Corps; Additional Complaint edits based on same; Follow up with other conservation groups; Review additional Corps permit provided by L.H.; Review Corps FOIA response from N.Q. with additional permits by Corps; Email exchanges with law clerk on same;	1.00 KGA

6/9/2016	Review Corps files obtain through FOIA to determine if there are other documents that relate to number of permits issued in 2007 vs. 2012 NWP 48; Follow-up and locate documents and CFR's that reference authorizations rather than verifications for NWP 48 permits; Follow up with L.H. to continue lack of response on Petition to Suspend by the Corps;	1.45 KGA
6/9/2016	Review email from L.H. with additional Mason County project approvals; Review comments from CFS attorney on draft complaint; Review email from L.H. with most recent article on shellfish aqua culture; Email to L.H. with thoughts on Mason County projects and why Corps may not be sending all the records;	.50 KGA No Charge
6/9/2016	Review email exchange between clients and KGA; Evaluate prospects for addisional claims;	2.00 TWT
6/10/2016	Revise Complaint;	1.50 TWT
6/10/2016	Additional follow up with law clerk on document review; Additional emails exchanged with co-counsel;	.25 KGA
6/13/2016	Revise Complaint;	1.00 TWT
6/14/2015	Further revisions on the Complaint; Legal research on same;	2.00 TWT
6/17/2016	Review revised draft complaint from co-counsel; Draft waiver of Summons request and review Summons drafts; Multiple emails exchanged with L.H. and co-counsel on timing of filing, and additional strategy issues for dealing with shellfish Industry and other amicus on either side; Send revised Complaint to L.H. and co-counsel; Review thoughts of co-counsel; Additional proofreading on Complaint;	4.50 KGA
6/20/2016	Review revised Complaint and Exhibits; Email exchange with L.H. and KGA on same;	.50 TWT
6/21/2016	Additional work on Complaint; Finalize Ex. C and Cover Sheet; Finalize Summons, and Notice and Waiver forms; Email exchanges with co-counsel on all of the above;	3.75 KGA
6/21/2016	Review revised Complaint with edits; Email exchange with KGA on same;	.50 TWT

6/22/2015	Review suggested edits and final Complaint;	.25 TWT
6/22/2016	File Complaint; Email to L.H. with final Complaint and advice on press issues;	.50 KGA
6/23/2016	Review filed Complaint, Assignment and Corporate Disclosure; Conference with L.H. and KGA;	1.50 TWT
6/23/2016	Review court Notice assigning Judge; Review Summons issued by court; Review court Notice on Corps Disclosure Statement; Draft Corporate Non-disclosure Statement; Forward same to L.H. for review; Research on assigned Judge; Discussion with co-counsel on strategy;	1.75 KGA
6/24/2015	Review background materials; Evaluate strategy; Phone call with L.H.; Set up meeting with KGA;	2.00 TWT
6/24/2016	File Corporate Disclosure Statement; Review email from L.H. with press coverage;	.50 KGA
6/26/2016	Review email from L.H. about CBD being heavily involved in commenting on Nationwide permits; Follow up with CBD and other conservation groups;	.75 KGA No Charge
6/27/2016	Review earlier pleadings in <i>Seattle Shellfish</i> and 2007, 2012, and 2017 NWP 48 on critical case background; Prepare for and confer with KGA on handling, evaluation, and strategy;	5.50 TWT
6/27/2016	Phone conference with co-counsel to discuss strategy on NWP 48 case;	.75 KGA
6/28/2016	Follow up with co-counsel on strategy issues; Follow up with L.H. on "red dot" map issues;	.95 KGA
6/28/2016	Phone call with CBD attorney who is drafting comments on all NWP's; Provide NWP 48 related information to same;	.30 KGA No Charge
6/28-29/2016	Indexing of all documents located to date for use in review of the completeness of Administrative Record ("AR") that will be produced by Corps in litigation;	14.25 Law Clerk
6/29/2016	Email exchange with KGA and L.H.; Phone call with DOJ attorney Kent Hanson on case background;	1.00 TWT

6/29/2016	Finalize and send Waiver of Service request to defendants; Follow up with client and co-counsel on same; Review update from co-counsel on his research about <i>Seattle Shell Fish</i> case resolution and how that might apply - if at all - in this NWP 48 case; Follow up with other conservation attorneys on their experiences with the assigned Judge;	.50 KGA
6/30/2016	Email exchange with L.H. on status and discovery; Review materials from L.H.;	.50 TWT
6/30/2016	Review email from L.H. with updates on mapping, Standing Declarants, and cite visit issues; Outline possible coalition for L.H. what needs to be in the Standing Declaration for each person;	.50 KGA
7/1/2016	Email exchange with KGA and L.H. on discovery and standing;	.50 TWT
7/1/2016	Review follow up note from co-counsel on discovery declarant issues;	.10 KGA
7/6/2016	Lengthy phone call and email exchange with Tribal contact about Tribes concerns about 2012 and proposed 2017 NWP 48; Provide instruction to L.H. on various FOIA's to send to Corps on NWP 48 acreage issues; Follow up with co-counsel on same;	1.75 KGA
7/7/2016	Long phone call with L.H. about aerial photos, "red dot" map, eelgrass, and possible letters (to Corps, NMFS, Counties, and others) using aerial photos once organized; Phone call with co-counsel to go over various issues as well as discuss possible additional infrared aerial photography in north Puget Sound and possible eelgrass expert;	1.25 KGA
7/7/2016	Review KGA message on discovery and case handling; Evaluate Exhibits; Evaluate and confer on same;	1.00 TWT
7/8/2016	Review L.H. draft FOIA's to Corps; Review co-counsel WPRA to DNR;	.25 KGA
7/8-14/2016	Further document indexing for use in the AR Completeness review;	24.00 Law Clerk
7/11/2016	Review draft CBD proposed 2017 NWP comments; Forward to L.H. and other conservation groups to help with their comments;	.50 KGA No Charge

7/12/2016	Review another L.H. FOIA to Corps; Additional research on judge assigned to our case; Review DNR preliminary response to co-counsel WPRA request; Provide thoughts on same;	.50 KGA
7/14/2016	Multiple emails exchanged with L.H., C.P. and co-counsel on settlement ideas should Corps and Industry willing to talk;	.50 KGA
7/14/2016	Phone call with Kent Hanson, L.H., and KGA on case background and settlement prospects;	1.00 TWT
7/15/2016	Letter to Blaine Reeves (WDNR) on record request;	.50 TWT
7/18/2016	Review letter to Corps from EPA and evaluate;	.50 TWT
7/19/2016	Phone call from Blaine Reeves from WDNR on record request;	.50 TWT
7/20/2016	Phone call with KGA on case evaluation, handling, and settlement prospects; Phone call to Kent Hanson on settlement prospects, status, and service; Review letter from CFS with Cape Wind ruling on agency obligation to review new submission;	1.25 TWT
7/20/2016	Phone calls with co-counsel about whether there are (or are not) really any settlement options;	.25 KGA
7/27/2016	Phone call with L.H. to review various issues, including status of draft Standing Declarations, status of aerial photo collection and organization, need for additional FOIA to Corps for updated permits issued list, and use of "red dot" map; Review status of comments on NWP 48 2017; Discussion with L.H. of separate Regional Condition comment deadline for proposed NWP 2017 that exists; Follow up reminder to L.H. to send me info on same;	.95 KGA
7/28/2016	Phone call from EPA person about NWP 2017 comments; Follow up email to L.H., C.P. and co-counsel on same;	.50 KGA
7/29/2016	Review FOIA Response from Corps forwarded by L.H.;	.10 KGA
8/2/2016	Review L.H. draft comments on proposed 2017 NWP 48;	.75 KGA

8/3/2016	Review emails on NWP 48 with Corps; Respond to same;	.50 TWT
8/3/2016	Review chart with NWP 48 "discharge limits" that Corps provided in response to L.H. FOIA;	.10 KGA
8/5-6/2016	Review DNR WPRA response to co-counsel document request; Emails with co-counsel on who will review the many 1,000's of pages in same; Review Pacific Oyster article from L.H.;	.50 KGA No Charge
8/8/2016	Review follow up email on settlement ideas from L.H.; Respond to same; Review inquiry from Industry attorney about Intervening; Provide thoughts on same;	.75 KGA
8/9/2016	Complete review of document index created by law clerk; Provide feedback to clerk and request for revised version of same; Review revised Document Index; Forward same to co-counsel and L.H. for review; Review April 2012 Corps NWP 48 "MFR"; Highlight same and send to L.H. with FOIA instructions;	2.00 KGA
8/10/2016	Phone call with Plauche intervening attorney on intervention; Email exchange with Plauche and KGA;	.50 TWT
8/10/2016	Create and send PDF of Coalition 2017 NWP 48 comments to L.H./C.P.;	.50 KGA
8/11/2016	Email exchange with KGA and intervening attorney Plauche;	.25 TWT
8/17/2016	Review preliminary Motion to Intervene and supporting Declaration;	1.00 TWT
8/18/2016	Respond to TWT's email regarding 8/5/16 batch of DNR documents posted for transfer per public records request; Begin downloading large file set to LBB service monitor download;	1.30 Paralegal No Charge
8/18/2016	Email exchange with Corps; Review email from L.H. on aquaculture from location regulatory burden; Email exchange with DNR regarding public records request and inspection of some records;	1.50 TWT

8/18/2016	Review information on new Industry experts and Health Department aquaculture maps located by L.H.; Review email with new Industry strategy/study for evaluating costs of shellfish regulation forwarded by L.H.; Email exchanges with co-counsel about DNR Eelgrass response docs; Review updated drop box entries by client rep F.P.;	.95 KGA No Charge
8/19/2016	Email to DNR regarding download of first batch (8/15/16) public records request documents; Cursory review of same and email to TWT on content; Copy flashdrive for file;	1.20 Paralegal
8/19/2016	Review L.H. draft Regional Comments to Seattle District on NWP 48 2017; Provide thoughts on same;	.50 KGA
8/20/2016	Review verification of service of Complaint on all defendants from Nationwide process service;	.10 KGA
8/22/2016	Review L.H. and co-counsel email about retired Corps employee who might be willing to consult; Provide thoughts on same;	.10 KGA
8/23/2016	Emails with attorneys; Copy WA DNR batch 1 record request documents to flash drive; Transmittal letter to KGA;	.60 Paralegal No Charge
8/23/2016	Email exchange with KGA regarding intervention;	.25 TWT
8/23/2016	Follow up on DNR public record docs related to eelgrass; Review Industry Motion to Intervene and supporting docs as filed; Forward same to client; Email exchange with co-counsel confirming we all agree, no point in opposing Motion to Intervene by Industry;	.60 KGA
8/25/2016	Email exchange with Plauche regarding intervention;	.25 TWT
8/25/2016	Letter to Corps attorney with Proof Of Service; Review updated document index from law clerk;	.25 KGA
8/30/2016	Email exchange with KGA and Plauche;	.25 TWT
8/30/2016	Review email from co-counsel confirming he advised Corps that we will not oppose Industry Motion to Intervene;	.25 KGA No Charge

8/31/2016	Letter to Corps attorney with Proof of Service and request for appearance;	.10 KGA
9/6/2016	Review NMFS comments regarding proposed NWP 48;	1.50 TWT No Charge
9/6/2016	Review of "Programmatic BiOp" for 2012 NWP 48 that we suspect Corps will try to rely on in lieu of NEPA for Cumulative Impact analysis;	.75 KGA
9/9/2016	Prepare for and attend conference call with KGA and DOJ attorney Kent Hanson regarding possibility of settlement; Meeting with KGA on same;	1.00 TWT
9/8-9/2016	Follow up with L.H. on Standing Declarations; Lengthy phone call with Corps counsel on whether settlement is a possibility or not, whether permits are being issued or not, as well as when the proposed Record is likely to be provided by the Corps; Follow up meeting with co-counsel on same; Lengthy follow up email to L.H./C.P. with status report;	1.75 KGA
9/11/2016	Review email with Corps Notice of public meeting with NWP 48;	.10 KGA
9/12/2016	Review L.H. confirmation that she will attend same;	.10 KGA
9/13/2016	Follow up with L.H. on need for Corps FOIA for copies of the District verification of permits; Review L.H. draft FOIA to Corps on same;	.25 KGA
9/13-15/16	Begin review of DNR Eelgrass documents and document Index spreadsheet;	17.00 Law Clerk
9/14/2016	Review email from Corps attorney asking about possible meeting for settlement discussions; Follow up with L.H./C.P. and co-counsel on same;	.10 KGA
9/15/2016	Email exchange with Tribal contact about Corps 9/13 Presentation; Review Corps Website link identified in 9/13 presentation; Review Corps Powerpoint; Follow up email to L.H./C.P. and co-counsel on potential use of the Corps IWR Viewer System and the useful pieces of the Corps cumulative impact slides;	1.25 KGA

9/15/2016	Follow up with L.H. on possible settlement meeting with Corps; Review additional FOIA to Corps by L.H. in response to my earlier email; Email exchange with co-counsel and L.H. about BiOp;	.75 KGA
9/16/2016	Follow up email to Corps attorney to schedule settlement meeting; Also ask again for location of cumulative impact analysis for the 920 already issued authorizations;	.25 KGA
9/18/2016	Email exchange with law clerk on indexing of DNR documents;	.10 KGA
9/19/2016	Review letter and attachments from KGA to Kent Hanson regarding cumulative effect;	.75 TWT
9/20/2016	Multiple emails exchanged with Corps attorney, co-counsel and L.H./C.P. to schedule settlement meeting;	.50 KGA No Charge
9/20/2016	Continued document indexing;	6.00 Law Clerk
9/22/2016	Continued document indexing;	6.00 Law Clerk
9/24/2016	Email exchanges with client rep and co-counsel on upcoming Corps meeting;	.10 KGA
9/27/2016	Review Answer filed by Corps; Forward same to L.H./C.P.; Prepare for Corps meeting; Follow up with L.H. on Standing Declarations;	1.25 KGA
9/28/2016	Travel to and from Seattle for Corps meeting (<i>billed at 50%</i>);	3.00 KGA
9/28/2016	Additional prep for meeting with Corps; Meeting with client reps and co-counsel to discuss upcoming Corps meeting; Meeting with Corps; Debrief with client reps and co-counsel thereafter; Begin outlining tasks for L.H. to follow up on, regarding issues raised during meeting;	5.75 KGA
9/28/2016	Travel to and from Seattle for Corps meeting (<i>billed at 50%</i>)	3.00 TWT
9/28/2016	Prepare for meeting with Corps; Meeting with Corps and client; Review Corps Answer and evaluate; Legal research on threshold for supplemental review;	4.50 TWT

9/29/2016	Review updated materials on shellfish aquaculture impact;	.50 TWT
10/3/2016	Finish review of Answer filed by Corps; Follow up with L.H. and co-counsel on same; Finalize outline of additional L.H./KGA tasks; Send to L.H.;	2.00 KGA
10/3-19/16	Additional document indexing;	49.00 Law Clerk
10/7/2016	Review KGA notes regarding Corps meeting and follow up tasks; Review Answer; Provide thoughts on both;	1.00 TWT
10/7/2016	Review email from co-counsel with additional ideas to add to task list; Finalize estimate of additional costs; Follow up with law clerk on document indexing;	.50 KGA No Charge
10/7/2016	Review email from CFS indicating they haven't reviewed BiOp in detail yet;	.25 KGA
10/11/2016	Review Scheduling Order from Court; Multiple follow up email exchanges with co-counsel on discovery and related issues; Follow up with L.H. on Standing Declaration issues;	.85 KGA
10/11/2016	Review Court Order regarding initial disclosure and docket; Emails with KGA on same;	.25 TWT
10/12/2016	Legal research regarding NEPA vs. ESA analysis; Cumulative effects analysis;	1.50 TWT
10/12/2016	Begin draft letter to defense attorneys summarizing proposed answers to the various issues the court wants addressed on Joint Status Report ;	.50 KGA
10/13/2016	Additional work on draft joint status report outline; Send to co-counsel for his review;	.25 KGA
10/13/2016	Review draft Joint Status Report; Respond to same;	.25 TWT
10/14/2016	Review Notice of Appearance; Email exchange with KGA on Joint Status Report; Review letter;	.75 TWT
10/14/2016	Review co-counsel feedback; Revise and send Joint Status Report letter to defense attorneys;	1.25 KGA
10/15/2016	Begin review of initial Gale draft Standing Declaration along with initial Ruddy draft Standing Declaration;	.95 KGA

10/17/2016	Multiple scheduling emails exchanged with defense attorney on discovery conference and Joint Status Report conference call;	.45 KGA No Charge
10/18/2016	Begin review of Macomson's draft Standing Declaration; Review co-counsel's thoughts on Ruddy and Macomson's Declarations; Begin review of Hendricks' draft Standing Declaration;	.75 KGA
10/18/2016	Review press release about Corps Near-Shore Eco-System Restoration projects provided by L.H.; Review Scheduling email from defense attorneys about upcoming conference call on Joint Status Report; Respond to same;	.25 KGA No Charge
10/19/2016	Review info on upcoming conference call; make sure co-counsel has same info;	.25 KGA No Charge
10/20/2016	Lengthy phone conference with defense attorneys on Joint Status Report issues; Debrief with co-counsel afterwards on strategy and tactic options on various issues; Begin review of additional FOIA responses that Corps provided to our request for monthly reports and number of authorizations issued;	1.75 KGA
10/20/2016	Attend Rule 26 conference call; Strategize with KGA thereafter;	1.00 TWT
10/20-23/16	DNR document indexing;	20.00 Law Clerk No Charge
10/21/2016	Review email from L.H. with additional thoughts on cumulative impact issues;	.10 KGA
10/23/2016	Review updated Document Index from law clerk with eel grass documents included; Forward Document Index to co-counsel and L.H. with thoughts on same; Review additional NMFS eel grass document forwarded by Tribal contact;	1.15 KGA
10/24/2016	Review email from L.H. on Pierce County draft Determination of Significance; Provide advice to L.H. on whether Pierce County can prevent Industry from submitting an EA and whether County is stuck relying on whatever the Industry EA says;	.60 KGA No Charge

10/25/2016	Forward NMSF eel grass comments obtained from Tribal contact to L.H., CFS, and others;	.25 KGA No Charge
10/26/2016	Draft Joint Status Report; Send to co-counsel;	.45 KGA
10/27/2016	Review co-counsel thoughts and make edits to same;	.50 KGA
10/28/2016	Send draft Joint Status Report to defense attorneys;	.25 KGA
10/31/2016	Do preliminary research on indispensable party issue; Task law clerk with further research on that issue and Standing;	.15 KGA
10/31/2016	Follow up with L.H. on missing decision letter in BWH shellfish permit; Review N.Q. email on same;	.15 KGA No Charge
11/1/2016	Review Corps counsel changes to draft Joint Status Report; Send to KGA;	.25 TWT
11/1/2016	Review revised draft Joint Status Report from defense attorneys; Review co-counsel's thoughts on same;	.50 KGA
11/1/2016	Review L.H. update to supporters on all the various things CPPSH has accomplished; Follow up with N.Q. on BWH decision letter issue;	.25 KGA No Charge
11/1-4/16	Legal research on current Standing case law; Draft Memo to KGA summarizing same;	5.17 Law Clerk
11/2/2016	Edit Joint Status Report to accept defense changes and to add additional information addressing LCR issues; Forward same to defense attorneys and co-counsel for review;	.75 KGA
11/3/2016	Review confirmation from defense attorneys that they agree to our additional changes;	.10 KGA
11/4/2016	Begin review of Standing Memo by law clerk along with revised draft Standing Declarations;	.30 KGA
11/6/2016	Complete review of law clerk Standing Memo; Provide feedback and further research direction to law clerk on same;	.50 KGA

11/7/2016	Make suggested edits to Standing Declarations to sync language to case law; Send to KGA;	2.95 Law Clerk
11/7/2016	Finalize and file Joint Status Report with court; Begin review of revised Standing Declarations provided by law clerk;	.50 KGA
11/9/2016	Legal research on indispensable party issue;	2.41 Law Clerk
11/10/2016	Legal research on indispensable party issue;	2.00 Law Clerk
11/14/2016	Review <i>De Tienne</i> Court Of Appeals opinion; Provide thoughts on same to L.H. and co-counsel;	.50 KGA No Charge
11/18/2016	Review Case Management Order issued by court; Send same on to L.H. with update on case status/plans;	.45 KGA
11/18/2016	Additional legal research on Indispensable Party issue;	.83 Law Clerk
11/19-21/2016	Additional legal research; Draft Memo on Indispensable Party issues; Memo sent to KGA;	3.00 Law Clerk
11/21/2016	Review L.H. email with Corps NWP 48 SPIF questions and answers;	.10 KGA
11/23/2016	Review L.H. email with NWP 48 2017 regional Conditions comment Notice from Corps; Provide brief advice on same;	.45 KGA
11/23/2016	Email exchange with L.H. and KGA on comments and NWP 48 2017;	1.00 TWT
11/24/2016	Review draft NWP 48 Regional Conditions in more detail; Begin review of law clerk Memo on Indispensable Party issue;	.95 KGA
11/25/2016	Complete review; Provide additional research direction;	.40 KGA
11/27-29/16	Additional research on Indispensable Parties issues;	1.25 Law Clerk
12/1/2016	Additional review of draft 2017 NWP 48 Regional Conditions; Provide advice to L.H. about draft comments to prepare on same;	1.50 KGA

12/1/2016	Review and respond to CFS email on draft Regional Conditions;	.25 KGA No Charge
12/2/2016	Follow up with co-counsel to get underlying Briefs in <i>De Tienne</i> ; Provide same to other counsel in Oregon who is interested in issue;	.50 KGA No Charge
12/5/2016	Phone call with Corps attorney about draft Record and possible delay of production of same;	.35 KGA
12/5/2016	Additional Indispensable Party Research;	2.34 Law Clerk
12/7/2016	Follow up with co-counsel delay suggested by Corps attorney; Review co-counsel thought on same;	.20 KGA
12/7/2016	Review message from KGA regarding record production delay and proposed amended Order and comment;	.50 TWT
12/10/2016	Review email from L.H. about "Clarification" notice from Seattle District on draft Regional Conditions for 2017 NWP 48; Locate Notice; Evaluate same; Provide advice on same to L.H. and co-counsel; Review co-counsel thoughts on same;	.50 KGA
12/10/2016	Review message from Corps regarding intent to remove regional protection eelgrass and forage; Provide thoughts on same;	1.00 TWT
12/10/2016	Follow up with other conservation groups to make sure they know about revised Notice;	.25 KGA No Charge
12/12/2016	Task law clerk with additional research on "existing" vs. "new" issue;	.10 KGA
12/13/2016	Review email from CFS, about meeting to talk about intervention; Advise L.H./Co-counsel of same;	.40 KGA No Charge
12/20/2016	Email exchange with L.H., and KGA regarding SPIF and NWP 48;	.50 TWT
12/20/2016	Review Corps announcement that NWP 48 SPIF no longer needed; Review co-counsel thoughts on same;	.10 KGA No Charge
12/20/2016	Follow up with L.H. on status of draft CPPSH comments on Regional Conditions;	.50 KGA

12/20/2016	Meet with CFS about possible intervention in current 2012 NWP 48 challenge and/or possible ESA challenge to 2017 NWP 48; Follow up emails to L.H. on same, as well SPIF use issue; Provide advice to CFS on FOIA's;	2.45 KGA No Charge
12/22/2016	Phone call with EPA staff person; Notify co-counsel and L.H. of same; Memo to file about EPA phone call; Begin review of CPPSH draft comments on Regional Conditions;	2.25 KGA
12/23/2016	Review and respond to emails from L.H. on Industry lobbying and Corps MOU on Puget Sound Protection; Briefly review MOU;	.25 KGA No Charge
12/23/2016	Follow up with Tribal contact on SPIF/Regional Conditions #10 & #14 issue and request copies of Tribal comments on 2017 NWP 48 a National and District level; Begin edits of CPPSH draft comments on Regional Conditions; Review court Notice of Withdraw of Plache associate;	.45 KGA
12/23/2016	Email exchange with L.H. and KGA regarding 2017 NWP 48, SPIF, and Regional Conditions;	.50 TWT
12/26/2016	Get update from Tribal Contact on their NWP 48 Regional condition views;	.20 KGA
12/27/2016	Skim Tribal 2017 NWP 48 comments; Follow up with L.H., co-counsel, and CFS with same;	.40 KGA
12/29/2016	Review NWIFC letter and Federal agencies MOU;	1.00 TWT
12/29/2016	Additional edits to draft CPPSH comments on Regional Conditions for 2017 NWP 48; Lengthy phone call with L.H. on same, status of suit, and next steps;	2.30 KGA
12/30/2016	Review email to KGA on status;	.25 TWT
12/30/2016	Review Corps denial of CPPSH public Hearing request on 2017 NWP 48;	.35 KGA
1/3/2017	Review draft comments regarding 2017 NWP 48; Review eelgrass studies and provide to L.H.; Evaluate Amended Complaint regarding ESA claims;	1.00 TWT
1/3/2017	Edit draft CPPSH comments on Regional Conditions;	1.75 KGA

	Send same to L.H.; Task law clerk with research on "existing" versus "new" in 2012 and whether Complaint is adequate to present that issue to the court;	
1/3/2017	Review Complaint and Answer and prepared notes on same in connection with research on whether Complaint adequately alleges Corps' errors in defining "existing" and "new" activities;	2.30 Law Clerk
1/4/2017	Review email from L.H. about new Eelgrass study; Provide advice on same; Review info provided by tribal contact; Phone call with Tribal contact;	.75 KGA
1/4/2017	Legal research regarding Rule 8 pleading standards under <i>Twombly</i> and <i>Iqbal</i> ; Email with KGA regarding need for additional information and decision documents to determine extent of Corps' reliance on "existing" concepts in projections of activities authorized under NWP 48;	4.00 Law Clerk
1/4/2017	Legal research regarding Rule 8 pleading standards under <i>Twombly</i> and <i>Iqbal</i> ; Email with KGA regarding need for additional information and decision documents to determine extent of Corps' reliance on "existing" concepts in projections of activities authorized under NWP 48;	2.50 Law Clerk No Charge
1/5/2017	Review L.H. revised draft Reg. Cond. Comments; Edit same; Send back to L.H.;	.95 KGA
1/6/2017	Emails with KGA regarding decision documents; Review decision documents to determine whether Corps made distinction in original docs between effects of new, existing, and expanded facilities; Analyze pleadings;	2.90 Law Clerk
1/6/2017	Review multiple emails from multiple sources with comments filed by others on Regional Conditions;	1.25 KGA No Charge
1/9/2017	Review and respond to multiple emails with various Reg. Condi. Comments filed by various folks; Review EPA & NWIFC comments to Corps;	.45 KGA
1/9/2017	Review multiple Reg. Condi. Comments filed by various folks; Review EPA & NWIFC comments to Corps;	1.00 KGA No Charge
1/10/2017	Review 9th Circuit <i>Great Basin</i> Opinion; Forward same to co-counsel and L.H. with thoughts on applicability;	.50 KGA

1/10/2017	Begin draft of Memorandum Re: Sufficiency of Pleadings;	2.90 Law Clerk
1/11/2017	Review recent Ninth Court decision on cumulative impact and NEPA;	.50 TWT
1/11/2017	Continued drafting Memo on Sufficiency;	.50 Law Clerk
1/12/2017	Continued drafting Memo on Sufficiency; Finalize Memo on Sufficiency of Pleadings; Send to KGA;	8.00 Law Clerk
1/12/2017	Review law clerk Memo on Complaint sufficiency;	.50 KGA
1/13/2017	Review email from L.H. with Corps Notice of "work days" to help Applicants;	.10 KGA No Charge
1/16/2017	Provide additional questions to law clerk on Complaint pleading issues;	.15 KGA
1/17/2017	Review law clerk follow up on questions and possible waiver analysis;	.10 KGA
1/27/2017	Review L.H. email with Corps Notice of 2017 NWP Publication in F.R.;	.10 KGA
1/27/2017	Review CFR; Review CFS thoughts on EPA comments to Corps on 2017 NWP 48;	.15 KGA No Charge
1/29/2017	Download 2017 NWP 48 Decision Documents; Begin review of same;	.50 KGA
1/30/2017	Email to L.H. about Decision Documents on 2017 NWP 48; Review multiple responses to same;	.50 KGA
1/31/2017	Multiple emails exchanged with L.H. and co-counsel about effect (if any) of Exec. Order that included a "Regulatory Freeze" on 2017 NWP 48;	.25 KGA
2/2/2017	Research on the ability to maintain suit after issuance of new NWP;	.75 TWT
2/2/2017	Review Corps NWP case from 11th Circuit on mootness issue; Do additional research on same issue; Provide thoughts to co-counsel on same;	1.25 KGA

2/2/2017	Outline project for law clerk regarding Decision Document review, legal research, and drafting of Amended Complaint to address 2017 NWP 48 ;	.70 KGA No Charge
2/3-13/17	Review 2012 & 2017 NWP 48 Decision Documents; Draft and provide Memo comparing both to KGA; Draft and provide Memo on cumulative impact analysis comparison's specifically;	6.50 Law Clerk
2/6/2017	Review announcement of comment period on Eelgrass management in Wilapa Bay; Forward to co-counsel;	.10 KGA No Charge
2/8/2017	Additional research on effects of 2017 NWP 48;	1.00 TWT
2/8/2017	Review email from L.H. about ESA coverage for NWP 48 users; Review response from CFS;	.10 KGA No Charge
2/9/2017	Review emails and respond to spraying;	.50 TWT No Charge
2/10/2017	Phone call to DOJ attorney Kent Hanson regarding record status; Advise L.H. and KGA of same;	.25 TWT
2/10/2017	Review email from L.H. about upcoming information meeting by Corps; Provide feedback to L.H. on same;	1.00 KGA
2/10/2017	Review follow up from co-counsel on EPA and herbicide issue; Provide outline of thoughts and approaches to addressing herbicide use Wilapa Bay; Review responses from CFS and co-counsel;	.75 KGA No Charge
2/14/2017	Review letter from Kent Hanson; Respond to same;	.25 TWT
2/14/2017	Review Memo on 2012 vs 2017 Decision Document comparison from law clerk; Review Memo on Cumulative Impact Analysis Comparison from law clerk; Review and respond to Corps' attorney's email about transmission of part of the draft Corps proposed AR; Task law clerk with Mootness research and draft supplemental Complaint;	1.50 KGA
2/16/2017	Research regarding cumulative impact; Review treaties regarding the importance of eelgrass status in Puget Sound, including new findings on disease resistance; Review NOAA comments regarding NWP 48;	2.50 TWT

2/15-17/17	Mootness legal research; Draft Memo on Mootness; Send to KGA;	6.50 Law Clerk
2/20-21/17	Draft Supplemental Complaint; Send to KGA;	3.84 Law Clerk
2/23/2017	Phone call with L.H. to discuss status of case and strategy for dealing with effects of 2017 NWP 48; Review email from L.H. with summary of Corps grower meeting; Emails to co-counsel with Comparison Memos, Mootness Memo, and draft Supplemental Complaint;	1.95 KGA
2/25/2017	Follow up with Corps lawyer on the status of proposed AR; Task law clerk with creating spreadsheet review of proposed Record and comparison to our relevant documents spreadsheet to determine what is missing;	.25 KGA
2/27/2017	Multiple follow up emails exchanged with Corps' attorney on proposed AR;	.25 KGA
2/27/2017	Review email exchange on Corps record and 2017 NWP 48 procedure;	.25 TWT No Charge
2/28/2017	Follow up with CFS to see if they are going to challenge 2017 NWP 48; Review CFS response;	.25 KGA No Charge
3/1/2017	Review email from Corps attorney indicating 2012 AR documents are still being reviewed by Corps and should be done soon; Respond to same;	.10 KGA
3/2/2017	Review draft Supplemental Complaint;	.25 TWT
3/6/2017	Review L.H. letter to Corps on Dungeonous Spit Industry Application; Review L.H. request to Corps for clarification on "withdrawn" Applications; Review L.H. FOIA on same; Review new study on farm gear and aqua culture from L.H.;	.45 KGA No Charge
3/7/2017	Review EPA Management meeting notes located and forwarded by L.H.; Provide follow up advice to L.H. on Corps FOIA and EPA meeting notes; Review L.H. thoughts on FOIA issues;	.30 KGA
3/8/2017	Review revised FOIA request to Corps from L.H.;	.10 KGA

3/8/2017	Send updated billing to L.H.;	.15 KGA No Charge
3/9/2017	Follow up with Corps counsel on status of AR production; Follow up with same on applicability of Executive Order (EO on regulatory freeze) to 2017 NWP 48; Review case Management Order and evaluate next steps in litigation;	.75 KGA
3/9/2017	Review email exchange on proposed AR status;	.25 TWT No Charge
3/13/2017	Review update from Corps attorney on EO's and AR production;	.10 KGA
3/13/2017	Review L.H. email about Judge;	.15 KGA
3/14/2017	Review and download Corps proposed AR CD's; Provide same to law clerk with instructions on starting comparison of Corps AR Index with our Index of documents;	.50 KGA
3/20/2017	Review Seattle District Corps final Regional Conditions and Notice of same; Make notes on lack on NEPA decision documents to support same; Review L.H. question on same; Follow up with CFS on missing final Decisional Documents to support with Regional Conditions; Review CFS response on same; Provide details on what we are looking for and advice on how to extract it from the Corps; Review CFS update from Seattle District about final Decision Docs on Regional Conditions not being posted yet; Begin review of Regional Conditions;	1.15 KGA
3/21/2017	Review Regional Conditions;	1.00 TWT
3/21/2017	Review follow up email from law clerk about comparison of document Index's; Follow up with Corps' attorney on effective date of 2017 NWP 48 in light of EO's; Review CFS update on same; Follow up with Corps' attorney on AR issues and likely need for delay in briefing schedule given incomplete AR; Follow up with law clerk on types of document review to do when reviewing AR produced so far; Update L.H. on various prior emails;	1.50 KGA

3/21/2017	Review follow up email from co-counsel about 401 issues; Review CFS thoughts on 401 issues: Provide advice on same; Follow up with co-counsel on DOE 401 Certifications;	.45 KGA No Charge
3/22/2017	Email exchange with CFS on Regional Condition Decision Documents; Review email from Corps' attorney agreeing to adjust briefing schedule and confirmation that Corps got OMB exception to EO regulatory freeze as of 3-19-17; Advise Corps' attorney that we will likely be challenging 2017 NWP 48 and need for NEPA Decision Documents on Regional Conditions to complete our analysis; Review follow up from CFS on same; Advise CFS and L.H. of Corps position that NWP 48 is now in effect; Review Corps attorney email indicating the Decision Documents for Regional Conditions will be posted in the "next week or two"; Forward to co-counsel with thoughts on same;	.65 KGA
3/22/2017	Review final DOE 401 Certification provided by CFS;	.30 KGA No Charge
3/30/2017	Review email from CFS with Regional Decision Documents; Follow up on same with Corps attorney outlining need for Amended or supplemental Complaint and proposed Motion to Vacate CMO; Follow up with law clerk on research and review of Regional Conditions and revised draft Supplemental Complaint to account for same; Review email from Corps attorney agreeing to an extension of deadlines and Motion To Vacate CMO; Respond to same; Follow up with co-counsel about contacting Intervenor counsel to confirm they also agree to Motion To Vacate CMO;	1.00 KGA
3/30/2017	Email exchange with KGA on extension amendments and docket; Email exchange with Plauche on same; Review Corps New Regional Decision Doc's on NWP 48;	1.00 TWT
3/31/2017	Review Intervenor attorney email on Motion To Vacate CMO; Phone call to court clerk to verify that the court prefers Motion to a conference call; Revise draft Motion To Vacate CMO and send to co-counsel for review; Finalize and file Motion To Vacate CMO; Send proposed Order on same to court clerk as required by local rules; Follow up with L.H. to explain the current situation and plan for next steps; Review court clerk confirmation that they got draft Order;	2.00 KGA

3/31/2017	Email exchange with KGA on stipulation;	.25 TWT
3/31/2017	Inquire about whether a NWP 48 "all conditions that apply" cheat sheet would be helpful; Follow up with CFS on their role in litigation from here on out;	.20 KGA No Charge
4/3/2017	Review email from Corps attorney about Motion To Vacate; Respond to same;	.10 KGA
4/3/2017	Draft Memo for KGA further comparing 2012 and 2017 NWP 48 Corps' Decision Documents; Additional work on supplemental Complaint;	3.58 Law Clerk
4/4/2017	Begin drafting email to Corps and Intervenor attorney outlining proposed new schedule;	.25 KGA
4/4/2017	Review email from KGA on Order, docket, and proposed schedule change;	.25 TWT
4/4/2017	Review email from CFS indicating they are in the process in getting approval on how to proceed; Provide detailed thoughts on how that would fit with our suit (or not) to CFS and co-counsel;	.40 KGA No Charge
4/5/2017	Emails with TWT on next steps;	.25 KGA No Charge
4/5/2017	Email exchange with KGA on status;	.25 TWT
4/6/2017	Review message from KGA on AR;	.25 TWT
4/8/2017	Follow up with CFS to see how their litigation approval process is going;	.25 KGA No Charge
4/10/2017	Review Corps' attorney email on Corps projected AR completion date; Respond to same with clarification questions;	.10 KGA
4/11/2017	Review email exchange with Corps on AR;	.25 TWT No Charge
4/11/2017	Review Corps' attorney clarifications; Draft Supplemental Joint Status Report; Send to co-counsel for review;	.80 KGA

4/12/2017	Multiple emails with law clerk on AR and Supplemental Complaint issues; Meeting with law clerk to get update on and provide further direction on proposed AR review; Begin outline of documents we need to notify the Corps should be added to AR; Review co-counsel thoughts on draft Joint Supp. Status Report; Revise draft Joint Supp. Status Report; Email same to opposing counsel; Follow up with Corps attorney on the proposed AR, and missing doc's; Meeting with law clerk to go over 2007 vs 2012 vs 2017 NWP Decision Doc. analysis and need for revised draft of Supp. C.P.I;	1.90 KGA
4/12/2017	Task law clerk with additional legal research and analysis of 2017 NWP 48 and issues with same; Locate 2007 NWP 48 key doc's; Forward to law clerk for use in comparative analysis;	2.00 KGA No Charge
4/13/2017	Review draft supplemental Status Report and comment;	.50 TWT
4/14/2017	Phone call with Corps attorney on AR issues;	.15 KGA
4/15/2017	Follow with Corps attorney on materials missing from AR materials; Emails with law clerk on AR issues;	.50 KGA
4/18/2017	Follow up with law clerk on AR issues; Review revised draft of Joint Motion to Amend Case Management Order from Corps attorney;	.25 KGA
4/19-21/17	Work on further drafting of Supplement Complaint;	2.25 Law Clerk
4/19/2017	Review Corps edits to draft Supplemental Status Report and comment;	.25 TWT
4/19/2017	Review co-counsel thoughts on draft Supplemental Status Report; Review Intervenor attorney comments on same;	.20 KGA
4/20/2017	Review revised draft Status Report and comment;	.25 TWT
4/20/2017	Follow up with co-counsel on Supplemental vs. Amended Complaint and briefing sequence change that Corps has proposed; Respond to Corps attorney with outline of thoughts on revised Joint Motion to Amend; Edit Joint Motion; Provide revised draft to opposing counsel; Phone call with Corps attorney to negotiate briefing schedule;	1.20 KGA

4/21/2017	Review final changes to Joint Status Report and comment;	.25 TWT
4/21/2017	Review additional edits from Corps attorney on Joint Motion; Review comments from Intervenor counsel on same; Edit Joint Motion; Send final proposed Joint Motion to opposing counsel for review; Review draft revised Supplemental Complaint from law clerk with thoughts on 2017 condition changes and Decision Document changes; Follow up with law clerk on strategy for same; Review co-counsel final edits to proposed Joint Motion to Amend;	1.00 KGA
4/24/2017	Review confirmation from Corps attorney that draft Joint Motion is acceptable;	.10 KGA
4/26/2017	Follow up with Intervenor attorney on same; Review Intervenor attorney response; File Stipulated Motion to Amend Case Management Order;	.50 KGA
4/27/2017	Review Stipulated Motion to Amend Case Management Order and docket;	.25 TWT No Charge
4/27/2017	Follow up with client rep L.H. to provide Stipulated Motion and update on CFS as well as advice for next steps;	.25 KGA
4/27/2017	Follow up with CFS on their participation and changes in scheduling;	.40 KGA No Charge
5/1/2017	Finalize draft of Supplemental Complaint and send to KGA;	.92 Law Clerk
5/1/2017	Begin review of draft Supplemental Complaint from law clerk;	.50 KGA
5/3/2017	Email exchange with CFS about case law on mootness;	.25 KGA No Charge
5/9-2/17	Work on reviewing 2017 NWP 48 inconsistencies, for use in drafting Sum. Jud. Mot.;	1.92 Law Clerk
5/10/2017	Review draft Supplemental Complaint and edit further;	.25 KGA

5/11/2017	Continue edits on draft Supplemental Complaint; Phone call with L.H. to go over which Corps permits have and have not been issued as well as go over FOIA responses; Follow up with L.H. and provide copy of Hood Canal Eelgrass permits under new Corps number and update on status of various matters and provide advice on North Puget Sound issues; Review multiple FOIA emails forwarded by L.H.;	1.85 KGA
5/14/2017	Edit draft Supplemental Complaint;	1.85 KGA
5/15/2017	Provide same to counsel for a review;	.10 KGA
5/16/2017	Additional edits to Supplemental Complaint; Review Corps April 2017 Monthly Action Report;	.75 KGA
5/19/2017	Review email from Corps attorney indicating they will not oppose our Motion for Leave to File Supplemental Complaint; Provide cleaned-up version of Supplemental Complaint to opposing counsel; Review update from Intervenor attorney on their review of same; Provide detailed email with instructions on various issues and draft Supplemental Complaint to L.H.;	1.65 KGA
5/19/2017	Review draft supplemental Complaint;	.25 TWT
5/19/2017	Follow up with CFS to provide indexes from Corps proposed AR's; Review Corps Website portal Monthly Action Reports;	.20 KGA No Charge
5/22/2017	Review confirmation from Intervenor attorney that they will not object to Motion/Stipulation for Leave to File Supplemental Complaint; Begin drafting Motion/Stipulation for Leave;	.35 KGA
5/23/2017	Follow up with law clerk providing additional advice on Sum. Jud. Mot. drafting issues; Send draft Motion/Stipulation for Leave to file Supplemental Complaint to opposing attorneys;	.85 KGA
5/24/17	Email exchanges with opposing counsel to confirm they will not oppose the Motion as long as we change certain wording;	.45 KGA
5/25/2017	Edit proposed Supplemental Complaint; More emails with opposing attorneys about Motion, also provide updated copy of proposed Supplemental Complaint;	2.30 KGA

5/26/2017	Review email exchange and supplemental Complaint; Review Motion and Order; Email exchange on same;	.75 TWT
5/26/2017	Finalize and file the Motion for Leave to File Supplemental Complaint; Draft proposed Order granting Motion; Multiple emails exchanged with opposing attorneys on same; Send Motion and Order to L.H. with follow up questions on 5/19 project list;	.50 KGA
5/30/2017	Review email from court clerk about proposed Order; Follow up with opposing counsel on same;	.25 KGA
5/31/2017	File proposed Order granting Motion for leave to file Supplemental Complaint; Review court signed Order granting Motion; Begin finalizing Supplemental Complaint for filing;	.55 KGA
6/1/2017	Review Motion and Order;	.25 TWT No Charge
6/10/2017	Review proposed AR;	.83 Law Clerk
6/11/2017	Further review proposed AR;	.53 Law Clerk
6/12/2017	Review Notice that Army Corps is holding NWP 48 verification public meeting; Email exchange with co-counsel on same;	.25 KGA
6/12/2017	Reviewing Law and current AR;	.25 Law Clerk
6/13/2017	Review NWP 48 Rules on verification and SAV delineation; Respond to same;	.50 TWT
6/14/2017	Review email from CFS indicating they have authority to file suit and challenge NWP 48 2017; Multiple emails with CFS counsel and L.H. on same; Letter to L.H. with updated billing;	.45 KGA No Charge
6/17/2017	Further review of decision docs;	1.00 Law Clerk
6/19/2017	Review decision docs and Record;	.83 Law Clerk
6/19/2017	Review follow up email on record issues from CFS attorney; Respond to same;	.10 KGA No Charge

6/20/2017	Review email from L.H. about Corps public meeting and multiple follow up emails about same;	.30 KGA
6/21/2017	Emails exchanged with CFS, co-counsel, and L.H. about Corps public meeting and outline of questions for same;	.15 KGA No Charge
6/21/2017	Review Court of Appeals decision on land use case forwarded by L.H.;	.10 KGA No Charge
6/22/2017	Review Common Interest Agreement from CFS;	.25 KGA No Charge
6/23/2017	Review follow up between CFS and L.H. on press issues;	.10 KGA No Charge
6/23/2017	Review decision docs;	.92 Law Clerk
6/24-30/17	Research cumulative impact regs and cases; Review case law and decision docs; Begin drafting Sum. Jud. Mot.;	10.09 Law Clerk
6/27/2017	Review L.H. outline of Corps public meeting on 2017 NWP 48;	.30 KGA
6/27/2017	Revise draft Common Interest Agreement; Send back to CFS for their review; Review CFS ESA 60 Day Notice; Update on their planned Complaint filing;	.20 KGA No Charge
6/28/2017	Follow up CFS on Corps Power Point presentation at public meeting on NWP 48;	.10 KGA
6/29/2017	Email exchange with law clerk on research issues;	.10 KGA
6/30/2017	Phone call with Corps attorney on AR issues; Follow up with co-counsel and provide detailed outline on scheduling issues along with discussion of draft Sum. Jud. Mot. that I have law clerk working on;	.85 KGA
7/1/2017	Review email from DOJ attorney Kent Hanson on AR issues;	.25 TWT
7/1/2017	Begin review of first draft of Sum. Jud. Mot. outline provided by law clerk; Provide initial thoughts on same;	.35 KGA
7/1-7/17	Further drafting of Sum. Jud. Mot.;	17.07 Law Clerk

7/3/2017	Review co-counsel and CFS thoughts on Corps delay in producing AR; Multiple emails exchanged on strategy for dealing with same; Follow up with law clerk on Sum. Jud. Mot. draft; Review email from Corp attorney with Index for discs being forwarded by the Corps as part of the 2017 record; Send same on to co-counsel and CFS;	.35 KGA
7/5/2017	Begin review of latest Sum. Jud. Mot. draft from law clerk;	.35 KGA
7/6/2017	Provide feedback on same;	.25 KGA
7/7/2017	Email exchange with CFS and co-counsel on distribution of AR discs which finally arrived;	.10 KGA No Charge
7/8/2017	Continue drafting Sum. Jud. Mot.; Shepardizing Sum. Jud. Mot. Cases; Provide revised draft Sum. Jud. Mot.;	1.91 Law Clerk
7/10-12/17	Have staff burn ARs CD for co-counsel; Review Common Interest Agreement signed by CFS; Sign same and send back to CFS; Review email from L.H. about Industry lobbying successful efforts to kill some of their legislation; Review multiple follow up emails on same;	.25 KGA No Charge
7/13/2017	Email exchange on status of production by Corps of 2017 NWP 48 proposed AR;	.10 KGA
7/17/2017	Review Answer filed by Corps and Answer filed by Industry to Supplemental Complaint;	.55 KGA
7/19/2017	Multiple emails exchanged with CFS attorney on issue of local counsel for CFS in Western District Of Washington;	.20 KGA No Charge
7/21/2017	Review contents of CD from Corps with additional NWP 48 2017 proposed proposed AR materials; Follow up with co-counsel on same;	.50 KGA
7/24/2017	Review email from CFS with an update on when they will be filing; Respond to same;	.10 KGA No Charge
7/27/2017	Follow up with law clerk on AR issues to see if everything we need is there; Review update from CFS on when their Complaint will be filed; Multiple emails exchanged with CFS attorney on getting them a copy of the proposed 2017 AR;	.60 KGA No Charge

7/31/2017	Review email from Intervenor Industry attorney with supplement document proposed for inclusion in the AR; Respond to same with an update on plaintiff's review of the draft AR; Review additional discs from Corps with additional proposed AR; Follow up with law clerk on same; Forward Industry document to L.H. and co-counsel; Notify Corps and Industry attorneys that we received disc 7 of the proposed AR;	.85 KGA
8/1/2017	Review email from Corp attorney agreeing to the proposal to take additional time to review a proposed AR; Notify L.H. and co-counsel of same with additional thoughts on next steps;	.25 KGA
8/1/2017	Review email from Industry attorney verifying that they received disc 7 and we are still missing the document that he submitted; Review email from Corp attorney indicating that document would be on disc 8;	.10 KGA No Charge
8/7/2017	Multiple emails exchanged with CFS on transmitting proposed 2017 NWP 48 AR that we received from the Corp; Begin review of draft CFS Complaint; Review CFS Record Index questions; Provide response on same;	.30 KGA No Charge
8/7/2017	Follow up with Corps attorney on lack of Indexes on proposed discs 6 and 7;	.15 KGA
8/8/2017	Multiple emails exchanged with CFS and law clerk on AR issues; Review email from Corps confirming no Index on some disc's, they will provide such when they propose the final AR; Respond to same;	.15 KGA
8/8/2017	Review email from CFS asking if there is a new Colonel for the Seattle District; Respond to same;	.10 KGA No Charge
8/9/2017	Provide thoughts on draft CFS Complaint to CFS attorney; Confirm no Protective Order is in place;	.15 KGA No Charge
8/10/2017	Review email from CFS confirming they have now filed Complaint; Review follow up between L.H. and CFS on press issues; Review email from law clerk with Index of his findings on his review of the proposed AR;	.50 KGA No Charge
8/10/2017	Review disc 8 of proposed AR from Corps;	.15 KGA

8/11/2017	Email to co-counsel and CFS and L.H. with update on disc 8 spreadsheet showing authorizations under NWP 48 exceeded by at least 370 times the number of authorizations issued under other NWP permits;	.40 KGA No Charge
8/15/2017	Review press info forwarded by L.H. on CFS filing;	.20 KGA No Charge
8/15/2017	Review updated spreadsheet from law clerk on Index of AR;	.10 KGA
8/22/2017	Phone call with L.H. to go over possible addition of the attorneys to help out on 100,000 page AR document reviewing as well as to discuss case status and other issues;	.45 KGA
8/22/2017	Review additional press for CFS litigation; Multiple emails exchanged with CFS and L.H. on same; Review multiple email messages about calls that CFS has received from local land owners; Respond to same with thoughts on property damage issues;	.40 KGA No Charge
9/3/2017	Follow up with CFS attorney on what Judge they drew;	.10 KGA No Charge
9/8/2017	Phone call with Corps attorney to go over CFS case consolidation and AR issues;	.25 KGA
9/11/2017	Email to CFS and co-counsel about phone call and next steps;	.25 KGA
9/14/2017	Prepare for and attend conference call with KGA on case handling, evaluation, and strategy;	2.00 TWT
9/14/2017	Conf. call with co-counsel and CFS counsel to talk strategy and timing; Follow up with Corp attorney thereafter;	.50 KGA
9/19/2017	Scheduling emails exchanged with Corps attorney to set up conference call about consolidation and related issues;	.25 KGA No Charge
9/20/2017	Review email from L.H. with additional press on NWP 48 and herbicide spraying;	.10 KGA No Charge
9/28/2017	Review Amended Complaint filed by CFS;	.75 TWT

9/29/2017	Conference call with Corps attorney and CFS to discuss consolidation, Briefing Schedule, and next steps;	.45 KGA
9/29/2017	Prepare for and attend conference call with KGA and Kent Hanson regarding status, handling, and scheduling;	1.00 TWT
10/2/2017	Review draft briefing schedule for consolidated cases from CFS attorneys;	.20 KGA
10/3/2017	Provide thoughts on same to co-counsel;	.20 KGA
10/4/2017	Email exchange with KGA on Complaint issues;	.50 TWT
10/4/2017	Review revised draft briefing schedule; Provide additional thoughts on same;	.15 KGA
10/5/2017	Review CFS email to Corps with draft schedule; Review Corps Agreement to Consolidate;	.35 KGA No Charge
10/6/2017	Review CFS email indicating shellfish Industry Assoc. will be Intervening in CFS case;	.10 KGA
10/8/2017	Phone call with L.H.; Multiple emails exchanges with co-counsel on how to respond to Industry attorneys;	.40 KGA
10/9/2017	Email with KGA on status and handling;	.25 TWT
10/9/2017	Review L.H. email with contact info on other attorneys interested in working on NWP 48 related issues such as HPA; Follow up email to CFS on same; Follow up with questions to other attorneys; Review response;	.40 KGA No Charge
10/10/2017	Review Motion to Intervene by PSEA in CFS case with supporting documents and messages;	1.00 TWT No Charge
10/10/2017	Review shellfish Industry Motion to Intervene in CFS Case;	.50 KGA No Charge
10/16/2017	Review draft and final Stipulation regarding consolidation;	.25 TWT
10/18/2017	Provide comments on draft Stipulation on consolidation and comment;	.25 TWT

10/19/2017	Review final Stipulation;	.25
		TWT
10/23/2017	Review AR Indexes (preliminary);	.50
		TWT
10/31/2017	Review revised draft Joint Motion for Consolidation and Briefing Schedule from DOJ; Discuss same with CFS; Follow up email with Corps attorney to confirm draft Joint Motion is acceptable;	.80
		KGA
10/31/2017	Meeting with other attorneys to go over NWP 48 and related other ideas to get at aqua-culture issues such as HPA;	1.50
		KGA
		No Charge
11/1/2017	Review email exchange and Notice of Appearance;	.25
		TWT
11/1/2017	Review revised proposed Stipulated Motion and Order Consolidating and setting Case Management Schedule; Follow up email to Corps attorney on standing; Phone call to Corps attorney on same; Multiple emails exchanged with co-counsel on same;	.55
		KGA
11/2/2017	Review email from Corps attorney accepting our proposed changes to the draft Order; Review Notice from court that Motion to Consolidate and proposed Scheduling Order was filed;	.50
		KGA
11/2/2017	Review email from L.H. with updated State of the Sound Report;	.20
		KGA
		No Charge
11/6/2017	Review Corp attorney email to court with Word version of proposed Order;	.15
		KGA
		No Charge
11/7/2017	Phone call from court clerk asking what parties wanted and Court's view of options; Follow up email to opposing and co-counsel on same; Review Corp attorney follow up email; Review email from Industry attorney on same;	.70
		KGA
11/8/2017	Review docket Scheduling Order;	.25
		TWT
11/8/2017	Review Joint Schedule and Order granting Motion to Intervene issued in CFS case;	.10
		KGA

11/9/2017	Email from co-counsel with news article about shellfish growers intervention; Review update from L.H. to coalition members about case and various other projects;	.65 KGA No Charge
11/15/2017	Phone call with L.H. about pending Corps NWP 48 registrations and plans for comments on same;	.75 KGA
11/15/2017	Phone call with L.H. about HPA case situation;	.15 KGA No Charge
11/17/2017	Review updated set of 11 comment letters submitted by L.H. to Corps on pending NWP 48 registrations; Follow up with L.H. on same; Review email from Corps attorney about Corps lodging the proposed AR in CD form; Respond to same;	.45 KGA
11/22/2017	Review multiple L.H. emails to Corps transmitting many additional NWP 48 comment letters; Follow up with L.H. on same; Review L.H. notes on number of letters sent, number of permits on current Corps lists, etc.;	.25 KGA
11/27/2017	Review Corps attorney letter to court transmitting CFS case AR;	.10 KGA No Charge
11/28/2017	Email exchange with KGA; Review Corps letter to Court on AR;	.25 TWT
11/28/2017	Review L.H. email to Corps following up on recently submitted comment letters;	.20 KGA
11/29/2017	Review Corps response; Multiple email's exchanged with co-counsel on the recent CD's filed by the Corps;	.20 KGA
12/1/2017	Review Forage Fish article sent by L.H.;	.10 KGA No Charge
12/4/2017	Follow up with L.H. on HPA situation;	.10 KGA No Charge
12/18/2017	Review email from CFS about next Corps aquaculture permitting meeting; Multiple emails exchanged with co-counsel, CFS, and L.H. on same;	.30 KGA No Charge

12/19/2017	Additional emails with L.H. on plans for her attendance of Corps aquaculture permitting meeting in January 25 th ;	.20 KGA
12/20/2017	Multiple emails with CFS, co-counsel and L.H. with potential questions to Corps at NWP 48 aquaculture meeting later in January;	.35 KGA
1/2/2018	Emails with CFS about GAO audit of Corps NWP 48 program;	.25 KGA No Charge
1/3/2018	Import AR discs 5-8 to computer;	.60 MJS No Charge
1/3/2018	Begin review of AR;	.40 MJS
1/4/2018	Meet with KGA to discuss scope of facts section of draft Sum. Jud. Mot.:	.50 MJS
1/4/2018	Forward AR Index's to MJS;	.20 KGA No Charge
1/5/2018	Read draft Sum. Jud. Mot.; Annotate; Search AR;	1.90 MJS
1/8/2018	Review Memo; Begin draft facts section for Sum. Jud. Mot.;	3.60 MJS
1/9/2018	Additional Index's forwarded to MJS;	.25 KGA No Charge
1/9/2018	Build outline for facts section; Read AR for facts; Draft and edit facts section;	2.00 MJS
1/10/2018	Continue drafting facts section; Find citations in AR; Review Complaint for facts needed in AR;	4.70 MJS
1/11/2018	Edit facts section; Review AR for citations; Review Complaint; Continue drafting Sum. Jud. Mot.;	3.40 MJS
1/12/2018	Begin review of draft fact section of Sum. Jud. Mot. from MJS	.40 KGA
1/12/2018	Meet with KGA to discuss Sum. Jud. Mot.;	.40 MJS

1/16/2018	Review emails on change in date for Corp NWP 48 Aquaculture meeting;	.20 KGA No Charge
1/17/2018	Provide feedback to MJS about his questions on status of various things and fact section of Sum. Jud. Mot.;	.35 KGA
1/18/2018	Continue to review AR for citations;	2.10 MJS
1/19/2018	Legal research on Sum. Jud. Mot. In W.D. WA;	2.10 MJS
1/22/2018	Review email from Corps attorney about possible Stay in NWP 48 cases due to funding issues in Congress and government shut down; Multiple emails exchanged with co-counsel and Corps counsel on same;	.50 KGA
1/22/2018	Fill in citations to AR in draft Sum.Jud. Mot. Brief; Review 2014 BiOp;	1.74 MJS
1/23/2018	Review materials from LH obtained at Corps Aquaculture meeting;	.60 KGA
1/23/2018	Multiple emails exchanged with CFS and GAO about possible meeting on Corp NWP 48 program;	.25 KGA No Charge
1/23/2018	Revise facts;	3.40 MJS
1/24/2018	Multiple emails with co-counsel with follow up to Corps public meeting;	.30 KGA
1/24/2018	Continue drafting Sum. Jud. Mot.;	2.20 MJS
1/25/2018	Research Motion for Leave to File Overlength Brief; Draft Motion; Continue drafting Sum. Jud. Mot. with AR cites;	4.60 MJS
1/25/2018	Review email from MJS with proposed Indexing approach to AR; Review email from MJS with draft Motion for Over Length Brief; Emails with CFS and co-counsel about number of permits that have been issued under 2012, number converted under 2017 and what additional permits referenced in the meeting are; Emails to Corps and Industry attorneys outlining concerns about inconsistent AR bait stamp numbers and the problems they pose for briefing;	.90 KGA

1/25/2018	Email exchange with KGA; Review aquaculture reporting documents;	.50 TWT
1/26/2018	Edit argument, find, reformat, and organize citations; Review and edit Sum. Jud. Mot. sent to KGA.;	6.00 MJS
1/26/2018	Review L.H. comments to Corp on NWP 48 conservation measures; Review CFS email with aquaculture data base info;Finish edits to Standing Declarations; Provide Standing Declarations to L.H. and co-counsel with instructions on same; Begin review of draft Sum. Jud. Mot. from MSJ;	1.65 KGA
1/27/2018	Review CFS email to defense counsel with AR supplements;	.20 KGA No Charge
1/29/2018	Prepare for meeting with GAO;	1.00 TWT No Charge
1/29/2018	Revise Sum. Jud. Mot.; Shepardize and update citations; Create draft Table of Contents;	2.20 MJS
1/29/2018	Continue review of revised draft Sum. Jud. Mot. from MJS;	.60 KGA
1/30/2018	Prepare for conference call with GAO investigators about Corps use of NWP 48;	.50 KGA No Charge
1/31/2018	Confer with KGA on case status; Meeting with GAO; Debrief on GAO meeting;	2.00 TWT No Charge
1/31/2018	Participate in conference call with GAO investigators about Corps use of NWP 48;	2.00 KGA No Charge
2/2/2018	Follow up with law clerk on obtaining documents to send to GAO;	.30 KGA No Charge
2/5/2018	Phone call with law clerk about docs to send to GAO;	.25 KGA No Charge
2/5/2018	Find L.H. comment letters in AR for citation in Motions; Additional work locating comments;	3.10 MJS

2/5/2018 Draft Memo for KGA to use with GAO;	.70
	MJS
	No Charge
2/7/2018 Provide documents requested by GAO during meeting with GAO;	.30
	KGA
	No Charge
2/7/2018 Meeting with KGA to discuss Sum. Jud. Mot. and AR;	.80
	MJS
	No Charge
2/8/2018 Additional emails with GAO about documents and issues;	.30
	KGA
	No Charge
2/8/2018 Organize key AR files for use as argument;	1.30
	MJS
2/8/2018 Review L.H. emails with documents;	.80
	MJS
	No Charge
2/9/2018 Forward copy of <i>Preserve Our Island</i> to MJS with thoughts on same;	.10
	KGA
2/14/2018 Additional emails with GAO;	.30
	KGA
	No Charge
2/14/2018 Sort through AR for agency comments;	2.90
	MJS
2/14/2018 Find key photos in AR;	2.30
	MJS
	No Charge
2/15/2018 Finish locating and cite CPPSH comments in draft Sum. Jud. Mot.; Draft and revise fact section; Multiple emails with KGA; Send draft Sum. Jud. Mot. to KGA;	2.90
	MJS
2/15/2018 Review files relevant to fact section;	1.50
	MJS
	No Charge
2/15/2018 Review email from Corp attorney about AR supplementation; Multiple emails between Corp attorney and CFS on same; Begin review of revised draft Sum. Jud. Mot. from MJS ;	1.20
	KGA

2/17/2018	Review photos from MJS for possible use in Sum. Jud. Mot.; Additional emails from MJS on acreage issues for use in Sum. Jud. Mot.;	.40 KGA
2/19/2018	Emails with CFS and MJS about acreage issues and AR location of records on same;	.30 KGA
2/21/2018	Review email from Corps attorney about AR issues;	.10 KGA
2/22/2018	Email exchange on spreadsheet data and scope of issued permits;	.50 TWT
2/22/2018	Review email from Corps attorney with spreadsheet on NWP acreage; Emails with MJS about review of same;	.45 KGA No Charge
2/23/2018	Review update from Corp attorney on date spreadsheet was created (3/12/15); Multiple emails exchanged with co-counsel on same and how it can be used in Sum. Jud. Mot.;	.75 KGA
2/23/2018	Review NWP 48 spreadsheet; Draft memo to KGA; Find facts in AR; Multiple emails with KGA;	5.20 MJS
2/23/2018	Review emails from KGA on Briefing issue;	.37 MJS No Charge
2/27/2018	Draft final argument section of Sum. Jud. Mot.;	1.10 MJS
2/28/2018	Review emails from TWT about additional materials on eel grass and Aquaculture issues;	.30 KGA
3/1/2018	Review email from CFS with docs obtained in FOIA Request to Corps; Briefly review docs;	.45 KGA
3/8/2018	Review phone message from L.H. about status of case;	.10 KGA
3/12/2018	Emails with CFS and co-counsel about Briefing schedule;	.25 KGA
3/12/2018	Begin drafting Memo on mootness for NWP 48 2012 claim;	2.70 MJS

3/12/2018	Review emails from KGA; Organize files;	.70 MJS No Charge
3/13/2018	Continue drafting mootness Memo; Research mootness caselaw;	1.90 MJS
3/14/2018	Review Notice of Filing of revised AR; Review WA Executive Order regarding Orca and Salmon protection; Evaluate application to our case;	.75 TWT
3/14/2018	Review Notice from Court that updated AR has been filed; Review email from Corps attorney on same; Review message indicating L.H. called with questions; Review L.H. email indicating Governor of Washington has signed an EO to protect Orcas;	.30 KGA No Charge
3/15/2018	Review Court Notice regarding receipt of AR;	.25 TWT
3/19/2018	Emails with MJS with AR transmission issues;	.20 KGA No Charge
3/20/2018	Emails to L.H. about Governor EO and inconsistency between that and his Shellfish Initiative position;	.20 KGA No Charge
3/22/2018	Review email from CFS about possible Briefing Schedule change;	.10 KGA
3/23/2018	Follow up with co-counsel and CFS. on same;	.15 KGA
3/26/2018	Review CFS. email to Industry to get their agreement on change in Briefing Schedule;	.10 KGA
3/27/2018	Review draft Stipulation for revised Briefing Schedule from CFS.	.25 KGA No Charge
3/28/2018	Review draft Stipulation on extention of deadline and comment;	.25 TWT

3/28/2018	Review Corps attorney edits to draft Stipulation on revised Briefing Schedule; Multiple emails between co-counsel and CFS on same; Review multiple emails between Industry and Corps on same; Review revised Stipulation from CFS.; Review additional proposed changes from Industry ; Follow up with L.H. with Standing Declaration drafts; Review additional emails on form of Order approving revised Briefing Schedule between Industry and CFS.;	.95 KGA
3/29/2018	Review Corps attorney email on filing of stipulated of revised Schedule and Order;	.10 KGA
4/2/2018	Review USACE permitting status update;	.25 TWT
4/2/2018	Emails with L.H. with Standing Declarations; Emails with MJS on how to address the AR page number issue in Sum. Jud. Mot.; Review revised draft Standing Declaration from M.G.;	.75 KGA
4/2/2018	Review AR;	1.40 MJS
4/2/2018	Research Bates numbering issue in AR; Emails with KGA on AR and case law;	.40 MJS No Charge
4/3/2018	Review draft Declaration regarding standard and critique same;	.50 TWT
4/3/2018	Update citations in draft TOA; Review and update citations in Brief; Cross check AR Bates numbers; Update Brief;	5.20 KGA
4/3/2018	Update file folders and makes notes on updated Bates numbers;	.30 MJS No Charge
4/4/2018	Review email from L.H. with signed Declaration; Review Ruddy Declaration draft; Email exchange with TWT about Gale Declaration draft and additions thereto; Send revised Declaration for signature to Macomson; Email exchange with Declarant Ruddy about her Declaration;	.80 KGA
4/4/2018	Update citations in Brief; Review and update AR citations;	2.90 MJS

4/5/2018	Work on Table of Authorities; Edit Table of Authorities; Read through and edit entire Brief;	9.10 MJS
4/5/2018	Review email from L.H. about new research on plastics on Puget Sound; Follow up with MJS on whether muscle study referenced in Gale Declaration is in AR and if so where; Email to Gale with revised standing Declaration; Review email from CFS attorney with Court Order extending Briefing Schedule; Begin review of latest Sum. Jud. Mot. draft from MJS; Provide initial feedback from MJS on same;	1.30 KGA
4/6/2018	Review Court Order and docket; Email exchange with KGA prospects of overlength Brief;	.50 TWT
4/6/2018	Email exchanged with Standing Declarant Gale on finalizing her Declaration; Multiple emails with co-counsel and CFS counsel about page limits in Briefing and whether to file a Motion to File and Over Length Brief; Review update from MJS on the calculation that there are over 180,000 page in AR;	.80 KGA
4/9/2018	Review DOE denial of spraying authorization and evaluate;	.50 TWT No Charge
4/9/2018	Review L.H. email about permit for herbicide spraying in Wilapa Bay being denied;	.20 KGA No Charge
4/9/2018	Review revised Sum. Jud. Mot. draft from MJS; Email with MJS about Briefing Schedule approved by Court; Begin edits to draft from MJS;	2.20 KGA
4/11/2018	Review revised Gale Standing Declaration; Review supplement to CV from declarant Gale;	.30 KGA
4/12/2018	Email to Standing Declarant Gale on same;	.10 KGA
4/13/2018	Review press release on herbicide spraying permit denial from L.H.	.25 KGA No Charge
4/13/2018	Multiple emails exchanged with L.H. and Standing Declarant Macomson about Declaration signatures	.60 KGA

4/18/2018	Review email with copy of suit filed on HPA issues by Coalition and others; Multiple emails exchanged with lawyers pursuing HPA case about strategy and about assigned Judge for same;	.75 KGA No Charge
4/19/2018	Review email from HPA suit attorney with notice that same Industry attorneys in our case are representing Industry in her case;	.15 KGA No Charge
4/19/2018	Multiple emails exchanged with co-counsel and CFS on Declaration filing logistics and filing; Continue edits to draft Sum. Jud. Mot.;	1.25 KGA
4/20/2018	Additional work on Sum. Jud. Mot. draft edits; Emails with L.H. to confirm specific facts for same; Provide updated revised draft Sum. Jud. Mot. to co-counsel;	3.40 KGA
4/21/2018	Review draft Brief and Corps verification spreadsheet;	1.00 TWT
4/23/2018	Emails to co-counsel and CFS trying to work out facts of Corps spreadsheet and permitting numbers; Email co-counsel seeking their position on a Motion for an over large Brief; Multiple emails exchanged with co-counsel on Briefing limitation issues; Follow up emails to co-counsel on number of verification issues and inconsistent statements in AR about same; Provide draft Sum. Jud. Mot. to MJS and co-counsel with detailed outline of thoughts and issues about same;	5.35 KGA
4/23/2018	Email exchange with co-counsel on Brief status and number Corps authorizations to date; Begin review of draft Sum. Jud. Mot.;	1.00 TWT
4/23/2018	Review multiple emails from KGA;	1.40 MJS No Charge
4/23/2018	Reply to emails from KGA;	.40 MJS
4/24/2018	Email to co-counsel MJS about ensuring that supplemental Complaint claims are specifically referenced and tied to factual and legal arguments in Briefing; Review email from CFS with possible preview of Corps argument that "minimal" means whatever the Corps says it means;	.40 KGA

4/24/2018	Review, confirm, and check edits, continue working through KGA edits; Find examples; Draft actual Motion section of Motion/Memo;	6.30 MJS
4/25/2018	Review confirmation that Corps attorney has no objection to Briefing extension; Emails with Industry attorney confirming same; Begin review of revised draft Sum from MJS; Finalize and file Motion for Over Length Brief; Locate and forward EPA NWIFC comments to Corps on Regional Conditions to MJS; Provide proposed Order on Over Length Brief to Court; Follow up with L.H. in response to her inquiry about Swinomish Tribe filing; Provide copy of same; Begin review of revised draft Sum. Jud. Mot.; Provide feedback to co-counsel on edits necessary to shorten Sum. Jud. Mot. draft; Follow up with co-counsel on changes to draft Certificate of Service caption; Review email from EJ Swinomish Tribe attorney with copy of the Complaint filed in their case; Multiple emails from co-counsel about Swinomish filing and possible effects on our case;	4.95 KGA
4/25/2018	Multiple emails exchanged on drafting Brief;	1.00 TWT
4/26/2018	Revise and edit draft Brief;	1.50 TWT
4/26/2018	Review suggested changes to Sum. Jud. Mot. draft from TWT; Additional edits to draft Sum. Jud. Mot.; Follow up with co-counsel on whether the NWIFC Tribal comments ended up in the record or not; Multiple emails with CFS and co-counsel about how to use Corps draft Cumulative Impact Analysis ("CIA") in the most effective way; Phone call with co-counsel and MJS on same; Provide additional thought on cumulative impact case law we should cite;	2.75 KGA
4/26/2018	Revise arguments, make edits throughout; Merge edits from other authors; Research arguments regarding factual inconsistencies in NEPA; Draft update arguments regarding NEPA and facts;	3.00 MJS
4/27/2018	Print and read through/mark up; Make edits from mark up; Email updated Sum. Jud. Mot. to KGA; Quick edits following email and comments;	5.20 MJS

4/27/2018	Read and respond to multiple emails from KGA;	1.20 MJS No Charge
4/27/2018	Review additional key documents; Review revised draft Brief with edits; Review Earth Justice lawsuit and comments	2.75 TWT
4/27/2018	Review email from EJ Swinomish attorney indicating their case has been assigned to Judge Coughenour; Respond to same; Email to opposing counsel with NWIFC comments and where in the record it is located; Begin review of revised draft Sum. Jud. Mot. from MJS; Emails with same about CFR's that apply to both EIS's and EA; Begin review of updated draft Sum. Jud. Mot.;	1.40 KGA
4/28/2018	Detailed edit on draft Sum. Jud. Mot.; Send same to co-counsel;	5.35 KGA
4/28/2018	Email exchange regarding draft Brief;	.25 TWT
4/29/2018	Provide revised version of Sum. Jud. Mot. to co-counsel with additional thoughts and questions on same; Follow up with co-counsel on best methodology for connecting claim for each of the allegations to each of the arguments; Forward draft CFS Sum. Jud. Mot. to co-counsel for review and to see what we can remove or eliminate to avoid duplication; Begin review of revised Sum. Jud. Mot. that is now close to 40 pages; Provide CFS a copy of our current Sum. Jud. Mot. draft so that they can similarly delete to try to avoid duplication and the size of their Brief; Provide feedback from MJS on various formatting and substantive in revised draft;	3.30 KGA
4/29/2018	Review draft Brief and comment;	.50 TWT
4/29/2018	Review emails and notes in draft; Update Sum. Jud. Mot.;	3.60 MJS
4/30/2018	Continue editing draft Sum. Jud. Mot.;	2.80 MJS

4/30/2018	Continue review of draft Sum. Jud. Mot.; Provide edits to same; Review email exchange on overlength Brief; Edit draft Brief;	2.00 TWT
4/30/2018	Review email from Corps attorney addressing the NWIFC comments which are for some reason not in AR; Multiple emails exchanged with co-counsel on page extension issue; Review revised draft Brief and detailed comments on same from co-counsel; Review additional revised draft with formatting and correction; Multiple emails with CFS making sure we attribute cites to national and regional documents correctly and that we are not overstating same; Additional edits to Sum. Jud. Mot.; Finalize and file Sum. Jud. Mot. with supporting Declarations; Review note from CFS counsel indicating they similarly filed;	5.40 KGA
5/1/2018	Continue edits to SJ Brief;	2.00 TWT
5/1/2018	Review email from CFS with their final filings; Email to L.H. with all of our final filings and CFS final filings; Review email from EJ Swinomish Tribe attorney asking for a copy of our AR to compare what Corps proposes in their case;	.25 KGA No Charge
5/2/2018	Multiple emails with the EJ Swinomish Tribal attorney and CFS counsel, and co-counsel to set up conference call to discuss effects of each case on the other;	.30 KGA No Charge
5/3/2018	Review email from L.H. about NMFS proposal to prepare EIS on Chinook Fishery plan; Provide thoughts and inquiry on how that relates to NWP 48; Review email from CFS indicating the Court granted their Motion for Over Length Brief;	.30 KGA No Charge
5/8/2018	Review email from CFS indicating they have a Scheduling Order setting a noting date for the Sum. Jud. Mot.; Respond to same, noting we haven't seen one yet in our case;	.20 KGA No Charge
5/11/2018	Review email from L.H. about WDFW and state Aquaculture regulation;	.25 KGA No Charge

5/16/2018	Conf call with EJ Swinomish attorney and CFS attorneys to coordinate on how their case and ours fit together; Memo to file/co-counsel thereafter;	.80 KGA
5/21/2018	Follow up email to Swinomish Tribe attorney on Corp NWP 48 Notice issues, etc.; Send Memo to file about 5/16/2018 conference with Snohomish Tribe attorney to L.H. with update; Review L.H. concerns about same;	.35 KGA No Charge
5/22/2018	Review email from L.H. about challenge to Corps on Armoring issues; Review update from Swinomish Tribe attorney on Tribal NWP 48 Notices; Respond to same with inquiry about whether we can supplement or substitute those Notices for our FOIA request and get records from Corps that relate to the case faster; Provide thoughts to L.H. on working with Tribes and draft CIA that we found in AR; Multiple emails exchanged with Swinomish attorney about whether Tribal Notices can be shared or not;	.45 KGA
5/23/2018	Emails with CFS about Shoreline Armoring suit against Corps (which is implicitly a challenge of NWP #13); Review email from CFS to GAO with draft CIA	.30 KGA
5/24/2018	Review email from L.H. about plastic pollution reports from BC due to shellfish aquaculture; Review CFS thoughts on same; Provide advice to L.H. about adding references to that study to CPPSH generic cumulative impact comment;	.40 KGA No Charge
5/24/2018	Email exchange with KGA on discovery and North Puget Sound lawsuit;	.50 TWT
6/14/2018	Review follow up email between CFS and Swinomish Tribe attorney on whether there has been a discussion of consolidation or intervention on her case;	.20 KGA No Charge
6/14/2018	Review case status; Email exchange on consolidation with Swinomish Tribal attorney;	.25 TWT
6/18/2018	Review cumulative impacts effects by Corps;	.50 TWT
7/5/2018	Follow up with Swinomish Tribe attorney to see about status on their case and provide an update and status of ours; Review response from Swinomish Tribe attorney;	.15 KGA No Charge

7/9/2018	Review email from Corps attorney indicating they are going to need an extension of the Briefing deadlines for their oppositions and replies; Emails with co-counsel and CFS on strategies for same; Review email from CFS back to Corps attorney; Confirm that Coalition does not object to extension with the express understanding there will be no further extension request from the government or Industry;	.45 KGA
7/11/2018	Review draft stipulated revision of Briefing Schedule from Corps attorney; Emails with co-counsel on same; Edit same; Run edits by co-counsel; Send revised version of stipulation back to Corps/Industry attorneys with confirmation that with these changes the Coalition is fine with extension; Review CFS confirmation of same; Review Notice from Court of filing of same by Corps; Review Corps attorney draft Order on stipulated extension; Confirm no issue;	.80 KGA
7/12/2018	Review Notice from Court of filing of same;	.10 KGA
7/12/2018	Review Ninth Circuit decision on NPDES permits for shellfish; Review and docket Sum. Jud. Mot. Order and Briefing schedule; Email exchange with KGA on same;	1.00 TWT
7/24/2018	Review Court Order on revised date for Sum. Jud. Mot.;	.25 TWT
8/6/2018	Begin review of Corps and Industry Sum. Jud. Mot. and Opp Memos; Forward same to L.H.; Review L.H. email late in evening with her preliminary thoughts on same;	.20 KGA
8/6/2018	Review Corps Sum. Jud. Mot. and Opp Memo; Review Taylor Shellfish cross Motion and Response;	1.00 TWT
8/7/2018	Review Notice from Court that 12/7 is tentatively set for the noting date for the Sum. Jud. Mot.; Continue review of Corps Sum. Jud. Mot.;	.95 KGA
8/7/2018	Review Corps Sum. Jud. Mot.; Compile notes on Sum. Jud. Mot.;	1.70 MJS
8/7/2018	Review noting date on Sum. Jud. Mot. and docket;	.25 TWT

8/8/2018	Review article forwarded by L.H. about orcas and the effect of plastics on same;	.25 KGA No Charge
8/10/2018	Review Corps FOIA response to L.H. with pending aquaculture permit list;	.20 KGA
8/10/2018	Review FOIA request status on permit processing and L.H. comments on Sum. Jud. Mot.;	.50 TWT
8/17/2018	Review article from L.H. about CBD lawsuit over orcas habitat and prey destruction;	.30 KGA No Charge
8/28/2018	Review JSR in Swinomish Tribe case; Review CFS email to Swinomish Tribe attorney indicating we had some of the same scheduling issues;	.25 KGA No Charge
9/5/2018	Review Federal Briefs on Summary Judgment;	2.00 TWT
9/10/2018	Begin drafting Reply/Opp Memo;	.80 MJS
9/10/2018	Begin creating document for Reply/Opp Memo;	.80 MJS No Charge
9/11/2018	Follow up email to MJS about Brief length given Corps/Industry Briefs; Review MJS thoughts on how to calculate same;	.15 KGA
9/17/2018	Outline argument of Reply/Opp Memo;	1.90 MJS
9/18/2018	Continuing drafting Reply/Opp Memo; Begin research on waiver argument;	1.90 MJS
9/19/2018	Email with MJS about Corps Briefing thoughts and my intent to get him thoughts on same;	.15 KGA
9/19/2018	Additional drafting of argument section on mootness; Finish mootness; Begin factual argument drafting;	2.00 MJS
9/20/2018	Continue drafting argument section re: NEPA/CWA;	1.20 MJS
9/21/2018	Finish review of Corps/Industry Briefs; Provide detailed thoughts to co-counsel on Corps/Industry Briefs along with multiple related Briefs other notes that I located on same;	2.25 KGA

9/24/2018	Re-read Industry and Corps Briefs for NEPA/CWA arguments; Continue drafting NEPA/CWA arguments;	1.90 MJS
9/24/2018	Re-read CPPSH Brief for NEPA/CWA arguments;	.40 MJS No Charge
9/25/2018	Additional legal research on various issues related to Reply and use of NEPA to manipulate habitat evaluation (or refuse to evaluate habitat manipulation); Provide same to MJS; Begin review of draft reply Memo from MJS:	1.30 KGA
9/25/2018	Research NEPA caselaw cited by defense; Continue to research NEPA caselaw cited by defense; Draft additional arguments for reply Brief; Continue NEPA argument in Reply;	5.00 MJS
9/26/2018	Research vacatur; Draft and edit throughout draft reply Brief; Email draft to KGA explaining Reply so far;	3.20 MJS
9/27/2018	Review email from CFS indicating Ecology has decided not to allow herbicide spraying in Wilapa Bay; Email exchange with co-counsel on same;	.25 KGA No Charge
10/1/2018	Emails with MJS on status of my review of draft Reply; Continue review of my draft Reply;	.40 KGA
10/2/2018	Provide detailed outline to MJS on my thoughts on Reply - including organization, substance, and misc. formatting issues I located; Provide additional thoughts on research topics and types of arguments to add;	.75 KGA
10/3/2018	Email KGA with progress and ask for feedback; Review KGA suggestions and edits;	.30 MJS No Charge
10/3/2018	Begin editing/revising reply/Opp Memo;	1.40 MJS
10/4/2018	Continue revising sections III and IV of Reply Opp Memo; Research deference case law; Revise section LVB based on research; Continue editing throughout Reply/Opp Memo;	6.40 MJS
10/5/2018	Full review of both Corps and Industry Briefs; Full review of CPPSH Reply/Opp Memo; Integrate markups and edits from full review into draft;	3.80 MJS

10/5/2018	Send draft to KGA/TWT for review;	.60 MJS No Charge
10/5/2018	Begin review of revised draft Reply from MJS;	.80 KGA
10/9/2018	Review draft Reply Memo and comment;	5.00 TWT
10/9/2018	Begin review of TWT suggested edits on Reply:	.25 KGA
10/10/2018	Review update from CFS on their Reply drafting;	.10 KGA
10/10/2018	Continue review and drafting of Reply Memo and comment;	4.00 TWT
10/10/2018	Review and reply to KGA/TWT emails;	.90 MJS No Charge
10/11/2018	Continue editing and research Reply Brief; Email exchanges and conference with KGA;	5.00 TWT
10/11/2018	Review email from TWT about State cumulative impact analysis that we might want to cite; Multiple emails and conference with TWT on Reply drafting issues; Review L.H. email asking for outline of things to say at public meeting about draft CIA;	1.60 KGA
10/11/2018	Phone call with L.H. to provide update; Review Corps Draft CIA for good quotes; Draft up summary of same for L.H. to use; Send to L.H. for use at up coming public meeting and in comments to Corps and others;	1.85 KGA
10/12/2018	Review and respond to multiple emails from KGA and TWT;	.90 MJS No Charge
10/12/2018	Finish editing of draft Reply; Review email exchanges on extension of filing deadline;	4.00 TWT
10/15/2018	Review TWT's edits on Reply Memo; Phone conference with KGA to discuss edit plans and strategy;	1.60 MJS

10/16/2018	Review email exchange on NWP 48 usage;	.25
		TWT
10/16/2018	Phone call with MJS on Reply issue;	.30
		KGA
10/16/2018	Find documents in AR; Phone conference with KGA on AR cites;	.60
		MJS
10/16/2018	Prepare to draft updated narrative with proper cites;	.60
		MJS
		No Charge
10/17/2018	Review email exchange; Review Motion to Postpone Deadlines; Review revised Brief;	.75
		TWT
10/17/2018	Begin review of revised draft Reply from MJS;	.90
		KGA
10/18/2018	Review Court Order postponing deadline for Motion response and docket; Begin editing revised draft;	1.75
		TWT
10/18/2018	Review emails from CFS counsel on extension of time to file replying; Review stipulated Motion for extension; Multiple emails exchanged with co-counsel and defense on same;	.30
		KGA
10/19/2018	Finalize edits to Brief and send to KGA;	2.00
		TWT
10/19/2018	Review email from co-counsel with edits to draft Reply; Briefly respond to same;	.20
		KGA
10/25/2018	Review co-counsel's edits to draft Reply; Begin edits on same;	.80
		KGA
10/28/2018	Finishing editing draft Reply; Return to co-counsel for further review;	1.30
		KGA
10/28/2018	Review KGA edits; Make further edits on Reply/Opp Memo;	.80
		MJS
10/29/2018	Review revised draft Reply forwarded by co-counsel;	1.00
		KGA
10/29/2018	Review L.H. letter to Pierce County on pending NWP 48 permits and shoreline compliance issues;	.30
		KGA
		No Charge

10/29/2018	Complete citations; Update language about authorizations in 2012 and 2017; Finish editing Reply Opp Memo; Send to KGA and TWT for feedback before begining Table of Authorities; Review next round of edits;	5.80 MJS
10/30/2018	Continue review of draft Reply; Review email from CFS counsel on same;	.60 KGA
10/31/2018	Multiple emails exchanged with co-counsel and CFS counsel on Reply issues; Review draft CIA again to highlight key passages; Review comments by CFS co-counsel to try to reduce duplication in briefing;	2.30 KGA
10/31/2018	Continue review and begin edits; Review AR for cites; Move some arguments; Find cites in AR;	3.10 MJS
11/1/2018	Multiple emails exchanged with co-counsel on Reply; Review revised draft Reply; Edit same; Return to co-counsel for final review;	4.90 KGA
11/1/2018	Phone conference with KGA; Review notes from phone conference; Continue edits with AR cites, caselaw, caselaw research for vacatur; Draft arguments, edit; Send to KGA; Build out Table of Authorities; Continue editing;	6.40 MJS
11/2/2018	Edit TOA; Correct errors in MS Word formatting; Read through and correct cites in body; Send to KGA for review;	6.40 MJS
11/2/2018	Review and edit draft Response Brief;	3.00 TWT
11/2/2018	Multiple emails and phone calls with co-counsel; Follow up with CFS on their Reply to try to ensure we are not duplicating Briefings; Review final draft of Reply Brief; Finalize and file same;	3.60 KGA
11/5/2018	Review CFS Reply; Forward same to L.H.;	.50 KGA
11/7/2018	Follow up with EJ Swinomish Tribe attorney to provide our Brief and CFS; Review email from CFS on Corps objection to CFS Reply Brief length;	.30 KGA No Charge

11/9/2018	Email exchange with CFS on their Briefing page limit issue;	.360 KGA
11/12/2018	Review email from L.H. with inquiry about who at NMFS is dealing with NWP 48; Respond to same;	.50 KGA
11/16/2018	Review CFS Reply.;	.30 KGA No Charge
11/16/2018	Review email from L.H. with inquiry about next steps and timeline in case; Provide advice on same;	.20 KGA
11/19/2018	Research on Keystone XL on Sum. Jud. Mot. decision regarding NEPA, ADA violations and evaluate;	.50 TWT
11/19/2018	Review email from L.H. and M.G. with quote from Keystone Pipeline decision on NEPA issues and inquiry whether it might be relevant to our cumulative impact analysis;	.20 KGA
11/29/2018	Review CFS revised Brief;	.50 TWT No Charge
12/6/2018	Review email from L.H. with announcement that Corps is proposing modifications and clarifications to the Programmatic BiOp conservation measures; Review Corps announcement materials;	.40 KGA No Charge
12/11/2018	Review modifications and clarifications to Shellfish Activity Program BiOp and evaluate;	.50 TWT No Charge
12/12/2018	Review email request from L.H. for outline of why the draft CIA is meaningful and how that document might be used to address DOE concerns as well as US Fish and Wildlife and NMFS issues;	.80 KGA No Charge
12/12/2018	Review email from Industry attorney about possible government shut down; Review DOJ attorney email on same issue; Emails with CFS attorneys on same issue;	.30 KGA

12/18/2018	Review emails on need for stay due to government shutdown; Email with KGA on same;	.50 TWT
12/18/2018	Phone call with L.H. about DOE email to State Senator; Review email chain; Provide advice on same;	.40 KGA No Charge
12/26/2018	Review email from DOJ with proposed draft Motion to Stay; Review emails from Industry and CFS on same;	.25 KGA
12/27/2018	Review TWT email to Corps attorney confirming Coalition, like CFS, will take no position on the Motion; Review DOJ attorney response on same;	.15 KGA
1/4/2019	Review revised Motion and Order on Stay; Emails with co-counsel;	.25 TWT
1/4/2019	Review revised stipulated Motion to Stay from Corps attorney; Emails with TWT to confirm we will not oppose; Provide authority for Corps attorney to sign on our behalf stipulating to the Motion to Stay; Multiple emails with co-counsel on Stay related issues;	.45 KGA
1/5/2019	Review email from Corps attorney about contact with Court to check on status on Defendant's Motion to Stay; Respond to same; Review Industry attorney email indicating they want to participate in conference call with Court Clerk to learn status of Motion; Review email from Corps attorney to Court with proposed Order on Motion to Stay; Review request from Corps attorney to agree to a stipulated Motion instead of a Non-Affirmed Motion; Multiple emails exchanged with co-counsel regarding strategy on same; Multiple emails with Industry and Corps attorneys as well as co-counsel on same;	.80 KGA
1/17/2019	Review email from L.H. on new book "Toxic Pearl" about herbicide use and shellfish;	.20 KGA No Charge
1/28/2019	Email exchange regarding status conference and docket;	.25 TWT No Charge
1/28/2019	Review email from Corps attorney wishing to discuss the Stay and getting the Briefing back on track; Multiple scheduling meetings thereafter;	.30 KGA No Charge

1/29/2019	Review email exchanges on schedule;	.25 TWT No Charge
1/29/2019	Review email from Corp attorney with proposed new deadline; Check with co-counsel; Confirm with Corp attorney that we agree with their proposed Briefing deadline;	.35 KGA No Charge
1/30/2019	Review email from Corps attorney indicating they will not get the Motion filed today as promised due to other conflicts and requesting a new deadline of another 5 days out from what they proposed and we agreed to yesterday; Multiple emails exchanged with co-counsel on same; Email to Corps attorney indicating we will not oppose the proposed deadline; Review email from CFS confirming that is their position as well	.40 KGA
1/31/2019	Review revised draft stipulation to re-set deadlines from Corps attorney; Review Industry confirmation the draft is acceptable to them; Provide confirmation the draft is acceptable to the Coalition;	.25 KGA
1/31/2019	Multiple emails exchanged regarding Revised Motion Schedule;	.50 TWT
2/1/2019	Review revised draft Motion with slight changes from Corps attorney; Review Industry confirmation revised draft is acceptable to them; Provide confirmation that the revised draft is acceptable to us; Review Corps proposed Order to go with revised draft stipulated Motion;	.35 KGA
2/4/2019	Review email from L.H. with Corps denial of registration under NWP 48 at Dungeness Wildlife Refuge; Provide advice on next steps on same;	.45 KGA No Charge
2/5/2019	Review Notice from Court that the Stay has been lifted and a new Briefing Schedule is in place;	.10 KGA
2/7/2019	Review Court Order regarding Schedule;	.10 TWT
2/8/2019	Review email from L.H. saying Corps has indicated there will be a new shellfish aquaculture permitting meeting in late February;	.10 KGA

2/12/2019	Review email from L.H. about Industry lobbying Congress trying to reduce aquaculture regulation; Review CFS response to same; Review email from L.H. with article in National Equal Justice publication about Coalition case;	.30 KGA No Charge
2/19/2019	Review email from defense attorneys about revised Stip Motion on briefing; Multiple emails with CFS & Co-Counsel on same; Email to defense consenting to same; Review Stip Motion as filed;	.40 KGA
2/26/2019	Review multiple emails with co-counsel and CFS about possible new tools to protect eelgrass and forage fish;	.20 KGA No Charge
2/27/2019	Begin review of Reply's filed by Corps and Industry on Sum. Jud. Mot.; Provide L.H. copies of same with preliminary thoughts on same;	.80 KGA
2/27/2019	Review Court Order regarding Su. Jud. Mot. and docket;	.25 TWT
2/28/2019	Review and take notes on defendant's Reply Memo to plaintiff's Reply/Opp Memo;	1.90 MJS
2/28/2019	Review Corps/Industry Replies to our Sum. Jud. Mot.;	1.50 TWT
3/2/2019	Continue review of Corps/Industry replies;	1.40 KGA
3/5/2019	Review email from CFS with GAO Report; Review note from staff that L.H. called and wanted to schedule a meeting;	.30 KGA No Charge
3/7/2019	Continue review of replies to our Sum.Jud. Mot.; Exchange emails on same with co-counsel;	1.25 TWT
3/7/2019	Phone call with L.H. to discuss Reply; Follow up with EJ attorney on Swinomish case on same;	.40 KGA
3/8/2019	Review emails between CFS and L.H. about status of denied NWP 48 permit for the Dungeness Wildlife Refuge;	.25 KGA No Charge
4/1/2019	Review email from co-counsel with new study in Science Daily on the importance of nurseries in coastal habitats;	.25 KGA No Charge

4/2/2019	Additional research on NEPA "hard look" and cumulative affects issues; Forward additional cases and Briefs to MJS ;	.130 KGA
4/5/2019	Review additional emails from L.H. and co-counsel about CBD suit on Orcas; Multiple emails exchanged on same and possible relevance on that case to ours;	.40 KGA No Charge
4/12/2019	Review email from L.H. with Wilapa Bay Eco System Review Team Report;	.45 KGA No Charge
5/11/2019	Review news article about Judge Lasnik;	.20 KGA No Charge
5/27/2019	Multiple emails with co-counsel about news article on Judge Lasnik and what that might tell us about his view on the case, if anything;	.30 KGA No Charge
6/6/2019	Email from Corps attorney indicating Court has contacted them and asked them how to use certain discs in the AR; Multiple emails with co-counsel on import of same and location of AR and the fact that the location in the AR where the query originated is near the draft CIA study;	.30 KGA
6/6/2019	Review message from Court Clerk regarding AR and request for information; Email exchange on how to inexpert same;	.25 TWT
7/9/2019	Email exchange regarding status and review Growth Management Board;	.75 TWT No Charge
7/9/2019	Review inquiry from L.H. about case status; Provide detailed response on same; Follow up email to EJ attorney on Swinomish case status;	.40 KGA
7/10/2019	Review emails from L.H. with DOE Motion For Reconsideration on GMHB's decision on Pierce County;	.20 KGA No Charge
8/6/2019	Review email from Court Clerk indicating the Court would like to schedule Oral Argument; Multiple emails with co-counsel to pick best dates; Review email from Shellfish Industry counsel providing their preferred date option; Multiple scheduling emails; Review follow up email from CFS Counsel confirming our availability for 9/17 or 9/24;	.30 KGA No Charge

8/7/2019	Review email from Corps attorney's indicating their availability;	.10 KGA No Charge
8/8/2019	Review Court Order on Oral Argument; Email exchange with KGA on timing and docket;	.50 TWT
8/8/2019	Review email from Court Clerk indicating Oral Argument will be set for 9/17; Emails with co-counsel about substantive strategy for same; Review Minute Order scheduling same; Email to L.H. on Oral Argument; Review L.H. email on salmon recovery efforts in Sound, and how there are inconsistent with Corps position on industrial aquaculture shellfish ;	.30 KGA
8/9/2019	Review email from Judge's Law Clerk asking about Dumbauld/McCoy Studies in 2009 and 2015; Emails exchanged with co-counsel on significance of same; Review email from Corp attorneys providing 2009 and 2015 Dumbauld/McCoy studies to Court;	.40 KGA
8/9/2019	Email to EJ attorney with Swinomish case to provide heads up on Oral Argument and Clerk email about studies; Review response on same; Provide copies of studies to EJ attorney; Review email from L.H. about Oral Argument travel expenses;	.20 KGA No Charge
8/13/2019	Email to client rep L.H. about Oral Argument travel expenses;	.10 KGA No Charge
8/15/2019	Review news article forwarded by co-counsel about seagrass and demand for luxury shellfish;	.20 KGA No Charge
9/3/2019	Review email from Corps attorney about splitting arguments three ways between three different Corps lawyers; Review Court Clerk response;	.20 KGA
9/4/2019	Emails with co-counsel with about prep; Create outline of Oral Argument Notebook;	.50 KGA
9/9/2019	Review email exchange with Court and counsel on Oral Argument;	.25 TWT

9/9/2019	Begin reviewing for Oral Argument; Follow up emails to MJS asking for additional data and docs to be pulled from Record that we can use as visuals if need be; Provide MJS with my thoughts about possible incorporating Bob Dylan reference of some sort if possible Oral Argument (or not);	.75 KGA
9/10/2019	Review and respond to emails from KGA; Collect Exhibits in preparation for Oral Argument; Send to KGA;	3.30 MJS
9/10/2019	Review email from CFS attorney indicating these are 2 other matters scheduled to follow our Oral Argument, so it looks like we only have 90 Minutes for entire Oral Argument; Review email from Corp attorney asking about amount of time allocated for Oral Argument; Review email from co-counsel MJS with outline of uploaded documents; Review download of potential Exhibits from link provided by MJS; Provide feedback on same;	1.25 KGA
9/11/2019	Review email message regarding Oral Argument; Review Briefs; Legal research on issues to help prepare for Oral Argument;	2.00 TWT
9/11/2019	Review email from Court to Corps attorney about length of Oral Argument; Follow up with MJS about additional docs for use at Oral Argument; Review various EPA and Tribal docs to see if they are in the Record; Review MJS detailed answers to my list of questions about documents for possible use as Exhibit; Review disc 6 of AR; Review Court Clerk email indicating the Judge is out of the office and will get back to us about the timing of Oral Argument; Follow up with MJS on various documents and various cases; Request additional research on <i>NWF v. NMFS</i> 2002 case; Follow up with staff on contents of Oral Argument notebook; Review email from MJS on updated cases; Review Memo from CFS attorney on "hard question list" and proposed moot times; Follow up with MJS on brief references on EPA comments and which version we referenced;	4.85 KGA
9/11/2019	Finalize Exhibit folder; Find docs for KGA; Forward all documents to KGA in preparation for Oral Argument; Collect information requested by KGA; Track down multiple references requested by KGA in Corps Regional docs;	2.40 MJS

9/12/2019	Email exchange with KGA on Oral Argument; Begin legal research and record review for Oral Argument prep;	2.5 TWT
9/12/2019	Review email from Court about timing of Oral Argument; Respond to Court email; Review email from TWT on same;	.20 KGA
9/12/2019	Continue prep for Oral Argument re-reading cases and Briefs;	3.30 KGA
9/12/2019	Emails with co-counsel on scheduling of Oral Argument moot;	.30 KGA No Charge
9/13/2019	Continue preparing for Oral Argument;	2.00 TWT
9/13/2019	Continue review of cases and Briefs; Multiple emails exchanges with co-counsel with specific questions about Record and arguments; Review 9th Circuit case and its implications; Work on outline of Oral Argument; Follow up with co-counsel on whether the Corps ever substantively responded to EPA's comments on regional conditions;	3.50 KGA
9/13/2019	Mutliple emails exchanged with KGA about Oral Argument issues;	.90 MJS
9/14/2019	Additional prep for Oral Argument; Review case law and AR; Additional follow up questions for co-counsel on <i>Conner v. Burford</i> and similarities between 2012 and 2017 registrations in the Seattle District for NWP 48; Multiple emails with co-counsel on same;	5.30 KGA
9/14/2019	Prepare record review for Oral Argument;	4.00 TWT
9/15/2019	Review Dumbauld studies and AR for Oral Argument;	6.50 TWT
9/15/2019	Review draft CIA again; Re-read Natl' & Regional CIA's; Continue Outline of notes for Oral Argument; Annotate visuals for Court; Multiple emails with co-counsel MJS on Oral Argument strategy and AR issues;	7.90 KGA

9/15/2019	More emails exchanged with KGA and TWT preparing for Oral Argument;	3.30 MJS
9/16/2019	Continue preparing for Oral Argument; Confer with KGA; Review all NWP 48 authorizations;	9.50 TWT
9/16/2019	Travel to Seattle from PDX (actual time billed at 50%)	1.60 KGA
9/16/2019	Moot for Oral Argument with co-counsel and CFS counsel; Strategize with same; Re-read key cases; Edit Oral Argument outline; Additional work on visuals for Oral Argument; Multiple emails with MJS on AR and legal research issues;	7.20 KGA
9/16/2019	Travel to Seattle from Portland (actual time billed at 50%);	1.75 MJS
9/17/2019	Preparation for and present Oral Argument; Debrief with multiple client reps and co-counsel thereafter;	5.50 KGA
9/17/2019	Last minute AR citations and analysis for KGA before Oral Argument; Assist with Oral Argument at Courthouse; Assemble supplemental cite docs; Send to KGA and TWT for review;	4.10 MJS
9/17/2019	Further prep for Oral Argument; Attend Oral Argument; Confer with L.H. and KGA; Review minutes Order;	6.00 TWT
9/17/2019	Travel from Seattle to PDX (actual time billed at 50%);	1.60 KGA
9/17/2019	Travel from Seattle to PDX (actual time billed at 50%);	1.65 MJS
9/18/2019	Email exchange and phone call with KGA on additional authorities;	.25 TWT
9/18/2019	Draft AR Supplemental Citation list; Emails with co-counsel on same; Finalize and file Supplemental Citation list of documents referenced during Oral Argument;	1.60 KGA

9/19/2019	Review email from Intervenor to court clerk, about Supplemental Citations list including AR cites; Review court response; Multiple emails exchanged with co-counsel about same; Review and edit draft Amended Supplemental Citations drafts; Locate and add additional AR citations in same; Edit summaries of AR citations to make page limit;	1.70 KGA
9/19/2019	Locate and add AR cites for Supplemental Citations;	1.60 MJS
9/19/2019	Review message from Court and draft from co-counsel on Supplemental Citations; Respond to same;	1.00 TWT
9/20/2019	Find additional AR citation in notes for Supplemental filing; Review emails and organize files from Corps, Intervenors, and Amicus parties regarding Remedy; Begin taking notes on same;	3.70 MJS
9/20/2019	Review supplemental filing;	.25 TWT No Charge
9/20/2019	Further additions and edits to Amended Supplemental Citations; File same;	.55 KGA
9/27/2019	Email with co-counsel about supplemental Citations; Review Corps/Industry Citation list; Additional emails with co-counsel on same;	.30 KGA
9/30/2019	Review Supplemental Citations submitted to Court by defense;	.25 TWT
9/30/2019	Review CFS Supplemental Citations;	.20 KGA No Charge
10/1/2019	Review supplemental citations from CFS;	.25 TWT No Charge
10/2/2019	Email to L.H. with outline of costs for lodging and travel for Oral Argument;	.15 KGA No Charge

10/11/2019	Review Notice from court with Minute Order deciding Sum. Jud. Mot. issues; Read Opinion/Order; Multiple emails with co-counsel and CFS counsel on same; Phone calls with co-counsel and CFS counsel on Remedy strategy; Review CFS follow up email to Swinomish attorney on Remedy issue;	1.65 KGA
10/11/2019	Review Order from Court; Confer with KGA; Email exchange with KGA and L.H.;	1.25 TWT
10/11/2019	Review email from Law 360 reporter with questions; Provide brief response to same;	.25 KGA No Charge
10/12/2019	Review email from L.H. about Coalition Blog Post on decision; Provide advice on same;	.30 KGA No Charge
10/12/2019	Review email from Swinomish attorney about Remedy issues; Review L.H. email with detailed thoughts on Remedy options and issues;	.60 KGA
10/14/2019	Review CFS attorney Memo on Remedy issues; Conf call with co-counsel and CFS attorney to strategize on Remedy responses and issues; Follow up with Swinomish Tribe attorney on issues that could affect Remedy (such as Tribal NWP 48 verifications); Begin to draft FOIA language to try to get at Corps permit data relevant to remedy;	1.45 KGA
10/14/2019	Prepare for conference with KGA; Attend conference with KGA on Remedy phase;	1.50 TWT
10/14/2019	Multiple scheduling emails to set up Remedy discussions between co-counsel, CFS attorney and Swinomish Tribe attorney;	.30 KGA No Charge
10/15/2019	Multiple emails with co-counsel on Remedy issues; Review lengthy letter forwarded by client rep L.H. from Coalition member about Remedy options; Phone call with L.H. about same; Email to L.H. with spreadsheets from AR to try to create list of "worst of the worst" cites; Provide detailed advice by email to L.H. on how the court ruling should affect things if one or more NWP 48 authorized folks try to convert to Individual permits;	1.45 KGA

10/15/2019	Email exchange with L.H. and KGA regarding Remedy options; Evaluate same;	.50 TWT
10/16/2019	Conference with KGA and DOJ attorney Kent Hanson on whether Settlement is an option for Corps;	.50 TWT
10/16/2019	Conf. call with Corps attorney to discuss whether a settlement would be an option for them; Phone call with co-counsel thereafter to discuss next steps;	.30 KGA
10/17/2019	Review press articles forwarded by L.H., co-counsel, and others; Review notes from L.H. about Industry representations to Thurston County about Lasnik decision and how they claim it has no local effects and the judge got the law wrong;	.35 KGA No Charge
10/17/2019	Discussion when to begin with MJS on drafting Fee Petition;	.25 KGA
10/23/2019	Review email from Corps attorney with Corps ESA report on acreage of permits issued under 2017 NWP 48; Review report; Emails with co-counsel about proposed second call with Corps attorney to discuss whether further settlement discussion would be fruitful or not; Provide pointed thoughts ESA Report on same to Corps attorney noting the report does not ID number of permits or location; Follow up with co-counsel and client rep L.H. on same; Review L.H. response;	.85 KGA
10/23/2019	Review email from L.H. with newspaper article about how chemical spraying in Willapa is stopped, for now;	.15 KGA No Charge
10/23/2019	Prepare for and confer with KGA; Phone call with Plauche;	1.50 TWT

10/24/2019	Phone call with Corps attorney to discuss whether settlement is an option; Debrief with co-counsel thereafter; Report to CFS & L.H. on same; Email to Swinomish attorney on same; Review email from Intervenor attorney to court, asking about the number of Motions on Remedy that can be filed ; Multiple emails with co-counsel on same; Review Vacatur case law from CFS; Respond to same; Email to co-counsel with outline of next steps on drafting of Opp Memo to Corps/Industry Motions; Follow up with co-counsel on creation of draft of Opp Memo that cites Industry long standing knowledge of Coalitions efforts to not only stop further permits until a cumulative impact analysis was done but also to seek Vacatur to exit permits;	1.80 KGA
10/24/2019	Prepare for and confur with DOJ and KGA regarding Remedy option; Email exchange on same;	1.50 TWT
10/25/2019	Review materials from L.H. on Shellfish industry background information, taxes, and employees; Review email from Court on Swinomish Sum. Jud. Mot. and Briefing; Email exchange on Vacant Remedy; Evaluate same;	1.75 TWT
10/28/2019	Review multiple emails between Court and Intervenor attorney and Swinomish Tribal attorney on "number of Motions" issue; Emails to co-counsel and CFS attorney on same; Review multiple emails from L.H. with statistics on Industry and dates of earliest Coalition comments to Corps, Follow up with other attorneys who have overturned NWP's about Vacatur issue to see what, if any, additional cases or issues came up;	1.35 KGA
10/28/2019	Phone call with Swinomish Tribe on Intervention; Email to KGA;	.25 TWT
10/30/2019	Begin review of Industry Remedy Motion;	.50 KGA
10/31/2019	Review Amicus Petition filed by Swinomish; Review Corps proposed Order, Memo, and Exhibits;	.25 TWT

10/31/2019	Continue review of Industry Remedy Motion; Review multiple emails with Remedy Motion filings by Corps, et al; Begin review of Corps Remedy Motion; Emails with L.H. and co-counsel on same; Begin review of Amicus Brief; Follow up with Swinomish Tribal attorney to get their Motion;	1.95 KGA
11/1/2019	Review Remedy Briefs and supporting Declarations from DOJ, Interveners, and Swinomish Tribe;	2.50 TWT
11/1/2019	Continue review of Remedy Motions filed by Industry, Corps, Tribes & Amicus Brief on same; Forward Motion to L.H.; Review Sound Action update forwarded by L.H. for facts that might be useful in Remedy briefing; Respond to L.H. questions about Remedy Motions;	2.60 KGA
11/2/2019	Review email from L.H. with her preliminary thoughts on Remedy;	.20 KGA
11/4/2019	Review email messages from L.H. and KGA on proposals and supplemental information needed;	1.00 TWT
11/4/2019	Review request from CFS/Press for copy of photos used at Oral Argument; Provide same;	.30 KGA No Charge
11/4/2019	Review L.H. email with additional detailed thoughts on Remedy;	.35 KGA
11/5/2019	Email exchange regarding Remedy Briefing; Evaluate same;	.50 TWT
11/5/2019	Multiple emails with co-counsel and CFS to outline and coordinate Remedy positions;	.80 KGA
11/6/2019	Email exchange with L.H. and KGA on Remedy Briefing; Review Swinomish Tribe errata filings;	.75 TWT
11/6/2019	Multiple emails with co-counsel on Remedy Opp Memo drafting and strategy issues; Multiple emails exchanged with L.H. on same;	1.60 KGA
11/6/2019	Begin drafting Memo in Opposition to defendants Remedy Motions; Continue reading Motions from industry and Corps;	1.70 MJS

11/7/2019	Review draft L.H. Decl in support of Remedy Opp Memo; Multiple emails with co-counsel on same; Begin edits to L.H. draft Decl; Multiple emails with Coalition Member Showalter to obtain her prior comments and verify accuracy of statements in draft L.H. Decl; Multiple additional emails with co-counsel on Opp Memo strategy issues; Continue edits to Remedy Opp Memo; Begin review of CFS draft Remedy Opp Memo to try to ensure we are not duplicating briefing on legal or factual issues;	4.90 KGA
11/7/2019	Review email messages; Review draft L.H. Declaration including proposed comments and Exhibits; Review CFS draft Brief on Remedy;	4.00 TWT
11/7/2019	Create outline for Memo on Remedy; Draft Memo on Remedy; Continue to draft Memo on Remedy; Coordinate with CFS on Briefing, phone call with CFS on law/facts breakdown; Continue drafting Remedy Memo; Edit Memo; Send to KGA for feedback;	8.80 MJS
11/8/2019	Review revised Briefs, comments, Declarations on Remedy;	1.25 TWT
11/8/2019	Additional edits to draft Remedy Opp Memo and L.H. Decl; Multiple emails with co-counsel on same, including draft proposed Remedy outline; Provide revised draft L.H. Decl to co-counsel for review;	3.60 KGA
11/9/2019	Update and edit Declaration and send to KGA and L.H.; Edit Memo, find exhibits, Shepardize, and send to KGA/CFS;	4.70 MJS
11/9/2019	Review further revisions of draft Briefs, Declarations, Exhibits, and comments;	1.00 TWT

11/9/2019	Further edits to draft Opp Memo and supporting Declaration; Send revised versions to co-counsel; Review suggested changes from same; Further discussion with CFS about joint position on Remedy; Follow up with L.H. on language of potential Remedy; Re-read Corps, Industry & Tribal Decl's; Additional edits to Remedy Opp Memo; Multiple emails with co-counsel on draft Opp Memo strategy and language choice issues;	4.65 KGA
11/10/2019	Update Declaration; Continue edits; Organize Exhibit folder; Send link to KGA for review;	3.30 MJS
11/10/2019	Continue edits to draft Opp Memo on Remedy and draft supporting Decl; Multiple emails with co-counsel on same; Provide updated version of proposed Opp Memo to L.H. for review; Provide revised draft Decl. to L.H. for review; Provide updated Opp Memo to co-counsel to review;	4.90 KGA
11/11/2019	Edit and revise draft language to add into Memo on Remedy; Phone conference with KGA; Research local Rules for filing procedure for proposed Order; Draft proposed Order and send to KGA for review;	4.70 MJS
11/11/2019	Review revised Briefs and Declarations; Provide edits to KGA;	2.75 TWT
11/11/2019	Review co-counsel thoughts and edits on draft Opp Memo; Further edits to both Decl & Opp Memo; Review draft proposed Order on Remedy; Edit same; Send revised Opp Memo, Decl, and Order to co-counsel; Send revised Decl. to L.H. with signature instructions; Leave VM for L.H. on same; Multiple emails with co-counsel and L.H. with updates on Remedy briefing;	4.85 KGA
11/12/2019	Final proof-read and revisions; Send to KGA;	.30 MJS
11/12/2019	Email exchange with KGA and L.H. on Remedy Brief review, final Brief, Declaration, and proposed Order;	2.25 TWT

11/12/2019	Finalize exhibits to Declaration on Remedy; Review CFS semi-final Opp Memo; Multiple emails with co-counsel; Finalize and file Opp Memo, Decl, & proposed Order on Remedy;	2.50 KGA
11/13/2019	Review CFS Remedy filing; Review new research on effects of oyster agriculture and send to KGA and L.H.;	1.50 TWT
11/13/2019	Begin legal research on Fee Petition issues; Multiple emails with co-counsel on same;	.75 KGA
11/13/2019	Review email from CFS with their Remedy Opp Memo; Review CFS Remedy Opp Memo;	.50 KGA No Charge
11/14/2019	Emails with MJS about Fee Petition drafting strategy;	.30 KGA
11/14/2019	Review scientific article located by co-counsel on how you need significant flushing in a Bay for oyster aquiculture to have only limited impact;	.30 KGA No Charge
11/15/2019	Review defendant's Reply Brief and Declarations;	1.00 TWT
11/18/2019	Review Reply Briefs on Remedy from Swinomish Tribe and DOJ;	1.25 TWT
11/18/2019	Review Corps, Industry and Swinomish Reply Briefs; Phone call with L.H. on status of case and related issues;	.95 KGA
11/20/2019	Begin research on EAJA and CWA standards; Research case law and example Petitions; Begin drafting Fee Petition;	2.20 MJS
11/21/2019	Review emails on status; Phone call with KGA;	.25 TWT
11/23/2019	Research on Seattle fee rates; Multiple emails with co-counsel about Fee Petition issues;	.40 KGA
11/23/2019	Review and respond to L.H. and co-counsel emails about possible draft Press Release when Remedy decision issued;	.25 KGA No Charge

11/23/2019	Emails with co-counsel about Fee Petition drafting; Legal research on availability (or not) of CWA 505 fees in our situation	.55 KGA
11/25/2019	Review L.H., CFS, and co-counsel emails on Press Release drafting;	.20 KGA No Charge
11/26/2019	Further research on Seattle attorney rates;	.30 KGA
12/3/2019	Review inquiry from L.H. about next steps;	.10 KGA
12/3/2019	Follow up with CFS on status of draft press release on Remedy;	.10 KGA No Charge
12/4/2019	Provide suggested quotes for draft Press Release on Remedy to co-counsel and CFS;	.30 KGA No Charge
12/4/2019	Respond to L.H. inquiry on next steps;	.15 KGA
12/5/2019	Further research with Seattle attorneys about Market Rates;	.30 KGA
12/6/2019	Review L.H. email with press articles on "New Dawn For Aquaculture In PNW";	.10 KGA No Charge
12/9/2019	Follow up with multiple Seattle attorneys on Market Rate issues; Review and respond to emails on same; Legal research on prior Lasnik decisions on fees; Forward findings on same to co-counsel;	.85 KGA
12/9/2019	Email exchange with KGA regarding appropriate fee rates to charge; Work on locating declarants on same;	.50 TWT
12/13/2019	Review email from co-counsel with research on oyster aquiculture and water quality in Chesapeake Bay;	.30 KGA No Charge
12/14/2019	Review L.H. email with new NMFS aquiculture coordinator for Oregon and Washington information	.30 KGA No Charge

12/14/2019	Review email from co-counsel about potential declarant attorney to support Fee Petition; Respond to same;	.25 KGA
12/15/2019	Email exchanges with KGA on Fee Petition; Review current hours; Talk with Seattle attorneys about doing supporting Declaration;	1.25 TWT
12/16/2019	Additional research on Seattle billing rates for attorneys with our varying experience levels; Emails with co-counsel on probable choice of rates for Fee Petition;	.55 KGA
12/17/2019	Review email from co-counsel with results from research on deadline for filing Fee Petition and whether it is or is not jurisdictional; Read case provided on same; Additional emails exchanged with Seattle attorneys on rate issues;	.45 KGA
12/18/2019	Multiple emails exchanged with various attorneys from Seattle and elsewhere about Seattle rate issues;	.60 KGA
12/22/2019	Review email from L.H. with NMFH newsletter about alleged need for "faster permitting" for aquiculture ;	.30 KGA No Charge
12/23/2019	Additional legal research on other Western District of Washington Fee decisions; Provide additional cases located to co-counsel;	1.20 KGA
12/27/2019	Continue drafting Fee Petition; Research case law on timeliness, substantially prevail, and take notes; Draft Petition;	1.40 MJS
12/30/2019	Follow up with co-counsel on their hours and proposal of organizing same into a single time sheet; Multiple emails exchanged with co-counsel on same;	.40 KGA
12/30/2019	Research rationale rate case law for newer attorneys, attorneys not barred in jurisdiction where litigation took place; Continue drafting Fee Petition sections on timeliness, reasonable rates, and special circumstances;	2.80 MJS
12/31/2019	Email exchange with KGA on Fee Petition;	.25 TWT
12/31/2019	Edits to existing time sheets for NWP 48 hours to try to "no charge" duplicative entries and any unrelated entries or clerical time entries;	2.75 KGA

1/3/2020	Additional edits to time sheets to try to reduce hours to appropriate billing and consolidate prior bills in to one time sheet;	1.90 KGA
1/3/2020	Beginning draft of Memo, edit and clean up Fee Petition - streamline language and form; Begin draft of "substantially justified" section; Research for "substantially justified" in law/facts;	2.30 MJS
1/6/2020	Continue drafting Fee Petition through "no special circumstances" section;	1.80 MJS
1/14/2020	Review L.H. email with HE Decision approving Jamestown S'Klallam Tribe aquiculture operation in Clallam County and questions about how that fits (or not) with court ruling in our case; Provide preliminary advice on same;	.40 KGA No Charge
1/14/2020	Research rates for attorney not barred in jurisdiction where case was heard; Draft Fee Petition through conclusion; Proof read and revise Petiton; Send to KGA;	2.90 MJS
1/15/2020	Review draft Fee Petition; Provide notes on same to co-counsel;	.40 TWT
1/15/2020	Review first draft of Fee Petition from co-counsel; Review TWT edits to same; Provide additional thoughts on same;	.55 KGA
1/23/2020	Review Fee Petition with notes from KGA and TWT; Make suggested edits; Re-check citations; Print and edit printed version;	2.40 MJS
1/23/2020	Email exchange with co-counsel on Fee Petition; Legal research on entitlement fees under CWA 404;	2.50 TWT
1/24/2020	Research cost of living adjustment; Begin drafting my Declaration in Support of Fees; Research Fee Petition Declarations; Finish my Declaration in Support of Fees; Edit and send to KGA for review; Begin drafting Hendricks Declaration;	4.10 MJS
1/24/2020	Additional research on rates; Begin review of draft client rep Declaration; Emails with co-counsel on draft attorney Declaration;	.80 KGA

1/28/2020	Provide edits to client rep Declaration;	.65 KGA
1/30/2020	Begin draft of TWT Declaration; Send to KGA; Begin draft of KGA Declaration; Review calculations for USAP matrix; Draft and re-draft for Seattle and Portland rate multipliers;	2.50 MJS
1/30/2020	Begin review of and edits to draft KGA and TWT Decl's in support of fees;	.60 KGA
1/31/2020	Phone call with L.H. on status of Remedy decision and Corps possible individual permitting of shellfish cites now that NWP 48 is not available;	.45 KGA
2/11/2020	Phone call with attorney A.H. about Dungeness Spit permit and implications of NWP 48 decision on same;	.90 KGA No Charge
2/10/2020	Provide additional edits to draft Declaration in support of fees by TWT roughed out by co-counsel MJS;	.25 KGA
2/13/2020	Emails with co-counsel about collection and compilation of hourly time records for use in Fee Petition; Edits to KGA existing 6 years of hourly time records to try to remove A-C privileged information and to ensure "no charge" for time that was only tangentially related to case or that was perhaps excessive;	4.65 KGA
2/13/2020	Review email from co-counsel on Fee Petition status; Research on EAJA award;	1.25 TWT
2/14/2020	Edit draft Declaration in support of fees roughed out by co-counsel MJS; Provide revised draft to MJS with notes on additional support information needed in various places; Emails with co-counsel about rate issues and supporting case law on same;	1.20 KGA
2/14/2020	Further edits to KGA existing hourly time to try to remove A-C privileged information and to "no charge" hours that will not be sought;	2.20 KGA
2/14/2020	Email exchange with co-counsel on Fee Petition and the 2013-2016 entries;	2.25 TWT

2/17/2020	Review inquiry from Coalition member about Quilcene WA Debob Bay NWP 48 authorized farm, that just received a DNR lease and the effect (if any) of Lasnik NWP 48 invalidation decision on ability of farm to start operations; Provide advice on same;	.65 KGA No Charge
2/17/2020	Draft FOIA to Corps regarding issuance since October 10, 2019;	.70 MJS
2/17/2020	Review draft FOIA request to Corps, to see if they really are no longer issuing NWP 48 authorizations and to see whether they are instead issuing Individual permits for shellfish aquaculture operations still without a Sound wide or any even a local cumulative impact analysis; Email co-counsel and CFS counsel about same; Email Corps attorney about same; Strategies with MJS on further research to support Fee Petition;	.95 KGA
2/18/2020	Update TWT and KGA Declarations with KGA edits;	.20 MJS
2/18/2020	Review revised draft Fee Petition, and revised draft KGA Decl in support of same; Multiple emails to MJS about edits to same;	.65 KGA
2/18/2020	Review email exchange regarding status of case and draft FOIA request for updated information from Corps;	.25 TWT
2/19/2020	Proof read; Update TWT and KGA Declarations; Update KGA Declaration with NLJ information research W.D. WA fee opinions for recent rates awarded; Refine hours; Forward to KGA;	4.20 MJS
2/19/2020	Multiple emails to MJS with additional suggested edits on draft Fee Petition; Review Corps attorney email about FOIA Request for shellfish aquiculture permitting doc's since Lasnik decision; Finalize and submit same to Corps; Review Corps email seeking more information on fee waiver issue; Emails with co-counsel on same;	.80 KGA
2/20/2020	More edits to KGA/TWT Fee Petition draft Declarations; Emails between MJS, KGA and TWT on same; Draft language for FOIA request fee waiver for use with Corps FOIA on recent aquiculture Permits issued; Send to KGA TWT;	1.80 MJS

2/20/2020	Respond to Corps FOIA Officer email seeking more info to support fee waiver for FOIA request for updated shellfish 404 permitting info at Corps since Judge Lasnik's ruling;	.35 KGA
2/21/2020	Review final FOIA request to COA; Email exchanges with DOJ attorney Kent Hanson and Corps;	.25 TWT
2/25/2020	Review email from L.H. with Corps Notice of Individual shellfish aquiculture permit application; Skim Notice; Provide advice on responding to same;	.40 KGA No Charge
2/26/2020	Review L.H. email on UW Sea Grant Conference and shellfish;	.25 KGA No Charge
2/26/2020	Follow up with MJS on Fee Petition and Decl drafts; Strategize about additional legal research to potentially help prove that Fee Petition hours are reasonable;	.35 KGA
2/26/2020	Review and edit hours for Fee Petition for formatting and phrasing consistency;	1.50 KGA No Charge
2/27/2020	Revise Fee petition; Send to KGA;	.80 MJS
2/27/2020	Skim new decision from USDC ID, involving vacatur; Send to MJS for closer review and possible use as a Supp. Auth. Notice on Remedy;	.35 KGA
2/28/2020	Review revised drafts of Fee Petition, KGA Decl, TWT Decl, MJS Decl & LH Decl.;	.30 KGA
3/3/2020	Review and edit attorney hours;	.75 KGA No Charge
3/4/2020	Review costs; Emails with MJS on Fee Petition and Declaration additions to cover same; Review 9 th Circuit Form 9 and EAJA Fee application forms; Emails with MJS to confirm nothing similar in WD; Further emails with MJS about researching any Opinions the discuss preferred format for presentation of and/or summarizing of hours in a Fee Petition in WD;	.70 KGA

3/9/2020	Review draft billing entries for Fee Petition; Revise billing entries;	.25 TWT
3/9/2020	Review and edit revised draft Fee Petition; Review research on rates in recent WD WA fee opinions; Multiple emails with MJS about case law on use of USAO Matrix and rate choices for myself, TWT & MJS;	1.35 KGA
3/9/2020	Review LH email about CA Coastal Commission decision rejecting aquaculture permit due to impacts on eelgrass; Respond with thoughts on same;	.35 KGA No Charge
3/9/2020	Edit Fee Petition to add section on costs; Add cost section to KGA Declaration; Send to KGA for review; Research Supplemental Authority options generally and in W.D. WA; Read recent NEPA decisions vacating rule; Email to KGA re: whether they apply; Draft Notice of Supplemental Authority; Send to KGA; More research on hourly rates in W.D. Wash; Update KGA Decl; Update Ree petition; Send KGA analysis on updated hourly rates; Research and draft email to KGA re: Laffey matrix, relevant cases and citations to the Matix in the Western US courts;	6.50 MJS
3/10/2020	Follow up email to MJS about use of OSB 2017 Econ, Survey and USAO Matrix as comparison points, as well as other thoughts on how to more effectively argue and support fees; Email exchange with TWT to check on status of update to his hours;	.60 KGA No Charge
3/10/2020	Review draft Supplemental Authority Notice drafted by MJS; Read 10 th Circuit <i>High Country</i> Opinion closely to be sure we are fairly representing it; Edit draft Supplemental Authority Notice; Send same to TWT and MJS to get their thoughts;	.85 KGA
3/10/2020	Email exchanges with co-counsel on EASA Petition;	.50 TWT
3/11/2020	Review MJS notes on revised Supplemental Authority Notice; Make additional polishing edits; Follow up questions to MJS on similarly (or not) between Rule at issue in <i>High Country</i> and each of the NWP 48 Rules at issue in our case; Review response; Add language to draft Notice to address same;	.90 KGA

3/11/2020	Send proposed Notice to CFS to get their thoughts on same; Review preliminary thoughts on same;	.35 KGA No Charge
3/11/2020	Review 10 th Circuit <i>HCCA v. Forest Service</i> regarding Vacatur; Email exchange with co-counsel regarding use as Supplemental Authority; Review and comment regarding draft Notice of Supplemental Authority;	1.25 TWT
3/12/2020	Finalize and file Notice of Supplemental Authority; Send same to L.H. with explanation;	.40 KGA
3/12/2020	Discussion with TWT on format of Fee Petition hours;	.20 KGA No Charge
3/12/2020	Review Coalition comments on Chelsea Farms - Lewis Shellfish, and William Geoduck Beach; Finalize hours for EASA Fee Petition; Send to co-counsel for review;	2.50 TWT
3/15/2020	Emails with TWT and MJS about hours and additional cases on importance of pre-filing work, that we might want to add to Petition or one of the Decl;	.35 KGA
3/16/2020	Email additional fee research materials to MJS;	.25 KGA
3/17/2020	Review revised updated Motion for EASA attorney fees and comments;	.25 KGA
3/17/2020	Phone call with MJS to discuss further strategy for framing of Fee Petition and what we really do and do not need to prove on hourly rate issues, given that it is an EASA case; Begin review of revised Petition and KGA Decl from MJS with changes precipitated by our discussion;	.90 KGA
3/17/2020	Adjust format of Fee petition - move discussion from KGA Declaration into Petition body, update citations; Research on "forum rates" and EASA application;	2.80 MJS
3/18/2020	Review Jamestown Sklallam Dungeness Refuge Individual Application comments from L.H.; Email exchange on status;	.75 TWT
3/20/2020	Another review of combined MJS, TWT & KGA hours to look for any duplication or other issues;	1.50 KGA

3/23/2020	Email exchange with co-counsel on status and Imazanox spraying approval and need for supplemental filing;	.25 TWT
3/23/2020	Emails with CFS about possible Supp. Auth. Notice related to DOE permit issuance that will further reduce eelgrass and affect outcome of Corps cumulative impact analysis;	.25 KGA
3/24/2020	Research on Cost Bills and LCR 54; Send info to KGA;	.60 MJS
3/27/2020	Review recent NEPA decisions regarding Vaestur - Standing Rock Sioux Tribe USACE 3/25/20; Research applicability on same;	1.25 TWT
3/31/2020	Draft KGA Declaration on bill of costs;	.60 MJS
4/1/2020	Review email from Corps FOIA Officer indicating Corps will need an extension of time to respond to our FOIA seeking any individual permits up for decision or issued, that used to be NWP 48 covered or that cover Industrial Scale Aquiculture operations that we denied NWP 48 coverage; Respond to same, agreeing to extension given COVID situation;	.20 KGA
4/1/2020	Review email exchange regarding FOIA request and response;	.25 TWT
4/17/2020	Review North Plains Resource Counsel decision re: inter-relation between NWP and ESA and evaluate re: application to our case;	1.00 TWT
4/18/2020	Review email from Corps FOIA Officer insisting that we agree to pay fees, even though we sought a fee waiver, before they will respond to our request; Respond to same, noting we agree but under protest and w/o waiver to sue the Corps for a bogus denial of fee waiver;	.25 KGA
4/20/2020	Email exchange with co-counsel re: North Plains Resource Counsel ESA decision and need for filing as additional supplemental authority and review and further analysis of decision;	1.00 TWT

4/20/2020	Review confirmation from Corps FOIA Officer that they now have what they need to process; Review emails from TWT with new decision from Dist. MT federal court overturning Corps NWP #12; Emails with co-counsel on implications of same for our Remedy decision and possible use as Suppl. Authority; Read 26 page MT decision;	.85 KGA
4/21/2020	Review draft Order and email from Court re: Oral Argument; Email exchange with co-counsel;	.75 TWT
4/21/2020	Review email from Court with draft Remedy Order/Opinion; Read Order/Opinion; Multiple emails with co-counsel on same; Provide update on same with advice on same to client rep LH; Review client response;	.90 KGA
4/22/2020	Multiple emails with co-counsel and defense counsel on scheduling options for Oral Argument;	.40 KGA No Charge
4/22/2020	Multiple emails with co-counsel on strategy for next steps, and likelihood that Corps/Industry will now finally be willing to negotiate;	.30 KGA
4/22/2020	Email exchange with all counsel on scheduling of Oral Argument;	.50 TWT
4/23/2020	Further email exchange with co-counsel on scheduling of Oral Argument;	.25 TWT
4/23/2020	Review draft Additional Suppl. Auth. Notice from MJS; Edit same; Follow up emails to and from co-counsel related to expected settlement negotiation efforts by Corps/Industry;	.45 KGA
4/23/2020	Read North Plains NWP 12 case; Draft Notice of Additional Supplemental Authority; Emails with LH, KGA, TWT, & CFS attorneys on court's draft Order on Remedy;	1.20 MJS
4/24/2020	Email exchanges on scheduling and Court Order on same;	.25 TWT
4/24/2020	Multiple additional emails with defense, interveners and co-counsel on date for Oral Argument; Multiple emails with co-counsel to schedule conference call to discuss settlement positions so we are ready if Corps/Industry reach out;	.35 KGA No Charge

4/24/2020	Review Minute Order from court scheduling Oral Argument on Remedy; Email client with info on same and a heads up about possible settlement negotiations; Review client thoughts on possible settlement negotiations with Corps/Industry; Follow up email to MJS about status of Supp. Auth. Notice;	.40 KGA
4/26/2020	Additional review of hourly time records to ensure no duplication or other issues, and that we have a rough total amount of hours, fees, and expenses should Corps/Industry attys want to talk about settlement; Follow up with co-counsel MJS & TWT to get their updated hours; Review revised draft Additional Supp. Auth. Notice from MJS; Re-read <i>NPRC</i> Opinion; Edit Notice; Send same to co-counsel for review before filing;	3.70 KGA
4/27/2020	Review draft Supplemental Authority Notice; Email exchange with co-counsel on same; Finalize and file same with the Court;	.50 KGA
4/28/2020	Prepare for and participate for video conf. with co-counsel on upcoming argument; Settlement review; Review draft Order and comment; Phone call with DOJ attorney Kent Hanson;	2.00 TWT
4/28/2020	Video Conf. with co-counsel and CFS to discuss strategy for Remedy Oral Argument and settlement options and positions if approached by Corps/Industry; Follow up email to Swinomish Tribe attorney at EJ, to see what their position will be at Oral Argument and whether there is some common ground that the Conservation Community and the Tribes could find;	.95 KGA
4/28/2020	Meeting with KGA, TWT, and AVS regarding Oral Arg prep and strategy;	1.00 MJS
4/29/2020	Review email exchange with Patti Goldman on settlement and Oral Argument; Review Sea Grant Law Center publication on shellfish aqua culture permitting under NWP 48; Prep for Oral Argument;	.75 TWT
4/29/2020	Emails with Swinomish Tribe atty at EJ to schedule phone call; Review Sea Grant articles on NWP 48 & ESA and aquiculture that TWT located;	.45 KGA No Charge

4/30/2020	Review request to participate in Oral Argument by Tribes and evaluate; Email echanage with client and co-counsel; Phone call with KGA;	.50 TWT
4/30/2020	Review Notice from Court that Jamestown S'Klallam Tribe is seeking to participate in Oral Argument as Amicus; Email to L.H. to advise of same; Email to CFS counsel to see if she can follow up with Jamestown atty to see what position Tribe is going to take if allowed to participate; Phone call with TWT to go over results of his talk with Corps atty; Follow up with L.H. on number of NWP 48 permits, if any, that she thinks are being processed by Corps;	.55 KGA
5/1/2020	Review Court Order re: Amicus Review Jamestown S'Klallam Dungeness Split application and email exchange on same;	.50 TWT
5/1/2020	Review Court Notice of Order granting Jamestown Tribe Motion for leave to participate at Oral Argument; Notify L.H. of same; Review L.H. detailed response to my inquiry about NWP 48 Registered operations that are now being noticed for comment by the Corps as Individual operations, and on the biology of various parts of the Sound; Follow up inquiry to L.H. for info we can potentially use are Oral Argument;	.70 KGA
5/2/2020	Review emails from L.H. with the CPPSH comments on the 3 Corps and one Ecology aquaculture operation permits noticed for comment since Judge Lasnik's opinion in Oct. 2019; Follow up email to L.H. to get clarification on whether any of these are former NWP 48 registered projects; Follow up emails with MJS on searching NWP 48 AR for any of these four operations;	.45 KGA
5/4/2020	Prepare for and attend conference with co-counsel regarding settlement prospects and prep for 5/18/20 Hearing;	1.00 TWT

5/4/2020	Phone conf. with Swinomish Tribe attorney to see if there is some common ground to be found on Remedy; Video conf. w/co-counsel to discuss phone call and next steps with Remedy/settlement negotiations; Follow up with L.H. on Swinomish operations and whether they are same or different from industry operations; Review CFS report on Jamestown S'Kallam Tribe position; Respond to same;	1.30 KGA
5/5/2020	Emails with L.H. and TWT about scheduling and hours;	.20 KGA No Charge
5/6/2020	Review Notice from Court with Oral Argument call in info; Phone call with L.H. to clarify permit issues; Review email from L.H. with Notices issued by Corps so far; Follow up emails with co-counsel on how to approach putting same in front of court; Follow up with co-counsel on Supp. Auth. Notice on Dist. ID decision; Follow up with MJS on possible visual for use at Oral Argument;	1.10 KGA
5/6/2020	Research pending authorizations at Seattle District; Send info to KGA and client;	1.60 MJS
5/7/2020	Review proposed Corps Permit and Van Savn comments and respond; Review Motion to Intervene (preliminary only); Email exchange with co-counsel regarding response; Legal research on timeliness issue;	2.00 TWT
5/7/2020	Begin review of draft Third Notice of Additional Authority drafted by MJS on ID Federal Court Opinion on Remedy in <i>ICL</i> ; Review Motion to Intervene and supporting Decl. filed by Nesbit; Multiple emails with co-counsel about issues raised by same and division of labor in responding to same;	.95 KGA
5/7/2020	Read opinion in IDC/GYC case; Draft Notice of Supplemental Authority;	1.10 MJS
5/8/2020	Further detailed review of Motion to Intervene; Email exchange with co-counsel regarding division of labor for response; Legal research on differences; Begin drafting response;	2.50 TWT
5/8/2020	Review multiple emails on Nesbit Intervention;	.30 KGA

5/9/2020	Legal research on adequate representation and timeliness; Investigate relationship between proposed intervenors and existing intervenors; Begin drafting Brief in Opposition; Review new Idaho Federal Court decision on Remedy; Draft Third Notice of Supplemental Authority and comment;	3.25 TWT
5/9/2020	Edit draft Third Notice of Additional Authority; Send to co-counsel for final review; More emails with co-counsel on Nesbit Intervention Motion; Legal research looking at cases on Intervention Timeliness cited by Nesbit; Outline why our situation is distinguishable; Follow up with L.H. to provide Nesbit filings and get her thoughts on Nesbit proposal;	2.25 KGA
5/10/2020	Review Nesbit Decl; Review L.H. thoughts on Nesbit Intervention request;	.45 KGA
5/11/2020	Attend conference with co-counsel regarding opposition on Motion to Intervene; Prepare for Oral Argument; Legal research on adequacy of representation and timeliness; Continue drafting Opp Brief regarding Motion for Preliminary Injunction' Email exchanges on supporting Declarations;	1.25 TWT
5/11/2020	Conf. Call with co-counsel and CFS about how to respond to Nesbit Motion; Complete outline of key distinguishing points for the primary intervention related cases cited by Nesbit; Send same to MJS for incorporation into draft Opp Memo; Emails with CFS counsel on briefing approach; Review Swinomish Tribe Opp Memo to Nesbit Intervention; Emails with co-counsel about same;	1.80 KGA
5/11/2020	Conf. Call with co-counsel and CFS about strategy for Oral Argument on Remedy; Review email from Court asking about who will present for Coalition at Oral Argument; Respond to same; Review L.H. email about new EO issued last Thursday by POTUS, on need for expansion of aquaculture; Provide thoughts on same, and how I plan to potentially use same if it comes up during Oral Argument; Follow up with L.H. on positions to take at Oral Argument;	1.95 KGA

5/11/2020	Call with co-counsel to discuss Motion to Intervene and opp Memo strategy;	.60 MJS No Charge
5/11/2020	Read through Motion to Intervene, attachments, and begin reading caselaw; Begin drafting Memo in Opposition to Nisbet Motion to Intervene; Review KGA caselaw notes; Begin incorporating into draft Intervenor Opposition Memo;	3.7 MJS
5/12/2020	Continue work on Opp Brief on Nisbet Motion to Intervene including additional legal research; Revise Brief and draft additional Barkhurst Declaration; Review PCSGA Memorandum and supporting Declarations; Email exchange with co-counsel regarding pre-hearing conference;	6.25 TWT
5/12/2020	Mulitple emails with co-counsel and L.H. about CPPSH member supporting Decl and Opp Memo to Nisbet Motion to Intervene; Review and edit draft Opp Memo from MJS; Review outline of thoughts from CPPSH member on Nisbet and Willapa Bay; Multiple emails with co-counsel about edits to draft Opp Memo on Nisbet Motion; Make and review additional edits to same;	5.85 KGA
5/12/2020	Finalize and file Third Notice of Supp. Auth.; Review email from Industry attorney inquiring about whether we want to talk; Respond to same confirming yes, and proposing date/time; Review Swinomish filings with proposed modifications to Court Draft Order on Remedy; Emails with co-counsel on same;	1.90 KGA
5/12/2020	Edit KGA contributions to Intervention Opp Memo; Begin integrating TWT contributions; Emails with co-counsel on Opp Memo for intervention; Complete integrating each contribution to Opp. Memo; Edit for content and formatting; Send to co-counsel for edits;	4.20 MJS

5/13/2020	Email to Ross Barkhurst; Review, edit, and finalize Barkhurst Declaration in Opposition to Nisbet intervention; Confer with Ross Barkhurst; Review Swinomish filing regarding effects of COVID 19; Email exchange with co-counsel on same and review of Federal aid to Industry and evaluate same; Email exchange with counsel on telephone with Amanda Carr; Email exchange for need for further editing and review; Edit latest draft Memo in Opposition to Nesbit Intervention and send to co-counsel for comments;	7.00 TWT
5/13/2020	Review revised version of Joint Opp Memo to Nisbet Motion; Multiple edits to same; Finalize and file Joint Opp with supporting Decl;	4.60 KGA
5/13/2020	Review Tongas fee decision by USDC AK; Forward same to MJS for use in Fee Petition; Review email from Industry attorney setting date for Conf. Call; Review L.H. email about JSK Tribe and their likely position as Amicus;	.90 KGA
5/13/2020	Edit, format, and update Opp Memo on Motion to Intervene; Incorporate KGA edits; Proof-read with new content; Send to co-counsel; Format and edit Intervention Opp Memo; Emails with co-counsel; Finalize and file Intervention Opp Memo;	4.20 MJS
5/14/2020	Review Swinomish and evaluate same; Review proposed Modification and draft Remedy Order; Call to client and co-counsel; Prepare and confer with Amanda Carr; Review Taylor Opposition to Nisbet Intervention; Phone call with K.H. regarding settlement prospects with client and co-counsel and evaluate settlement proposals;	5.25 TWT

5/14/2020	Review Taylor revised proposed Remedy Order in Swinomish case; Multiple emails with co-counsel about Remedy issues; Phone call with L.H. about Taylor proposal; Phone call with Industry attorney to discuss (for the 1 st time) settlement; Phone call with Corps attorney to discuss same; Review CFS summary of phone call with Amicus attorney; Review emails to and from Swinomish attorney providing input on whether they would or would not fall with in the Taylor proposal and asking about our position on the Tribe's revised Remedy Order; Review potential Oral Argument exhibits that MJS worked up; Emails with co-counsel on same; Review L.H. email with thoughts on new Taylor proposal; Provide update to L.H. on discussions with Industry and Corps attorney; Send L.H. copies of Industry filings in CFS case;	3.50 KGA
5/15/2020	Prepare and confer with co-counsel on prep for Oral Argument, Motion to Intervene, and Settlement prospects; Email exchange with co-counsel regarding need for clarification for settlement prospects; Review Showalter comments on settlement proposals; Review updated map on geoduck farms; Email exchange with co-counsel and L.H. concerning response to Tribal settlement proposal including U.S. and Washington shellfish decision on scope of Treaty shellfish rights;	2.75 TWT
5/15/2020	Conf. call with co-counsel to discussion Oral Argument strategy and settlement discussion strategy; Phone call with L.H. to discuss status of case, next steps and Coalition positions on various recent proposals for modification of draft Order; Emails with co-counsel on same; Conf. Call with Industry attorney and CFS to discuss the Industry proposed modifications to draft Order in more detail; Multiple emails and phone calls with co-counsel about same; Multiple emails with Swinomish Tribe attorney about our position on their proposed modifications to court's draft Order on Remedy; Review filing by Amicus Jamestown S'Klallam with another proposed modification of court draft Order; Emails with co-counsel on same; Outline some of the many questions that these last minute proposed modifications raise; Begin outline of Oral Argument notes;	4.60 KGA
5/15/2020	Call with co counsel to discuss Oral Argument on Remedy, strategy, and upcoming calls with opposing counsel;	.50 MJS

5/16/2020	Further preparation for Oral Argument; Work on “questions Ex” for use during same; Multiple emails with co-counsel on same; Lengthy email to L.H. with update on case and my current strategy for Oral Argument, to make sure Coalition is comfortable with that approach;	3.95 KGA
5/17/2020	Review Jamestown and Klallam Tribes to request to respond to proposed modifications of the Court draft Order; Respond to same; Legal research on scope of treaty on shellfish rights; Prep for Oral Argument; Review draft questions for Court; Email exchange with co-counsel on same; Phone call with K.G.;	2.75 TWT
5/17/2020	Review all recent filings in preparation for Oral Argument; Read <i>NPRC</i> Amended Remedy Order to determine if situation is comparable; Finish up Oral Argument outline; Review potential Demonstrative Exhibit; Share same with co-counsel to get feedback on content and strategy for more effective use; Review co-counsel emails on <i>NWEA v.EPA</i> case;	3.70 KGA
5/18/2020	Attend Oral Argument; Email exchange and phone call with co-counsel on next steps and L.H. concerns; Review minute orders and docket;	2.75 TWT
5/18/2020	Prepare for and participate in Oral Argument on Remedy; Multiple phone calls and emails with co-counsel and L.H. to debrief on same; Follow up by phone and email with Amicus JSK attorney who claimed I failed to return the call, asking when that was as we have no record of such a call and that we have never opposed their FLUPSY or their Treaty rights;	2.35 KGA
5/18/2020	Listen in to Oral Argument on Remedy; Exchange emails with co-counsel with notes on argument;	.90 MJS
5/20/2020	Review email with inquiry by neighbor about Goeduck farm proposed for Thurston County, where County claims Judge Lasnik merits ruling is not relevant to County MDNS; Provide advice on scope of our merits ruling, and the intersection (or not) between local govt and Corp and SEPA vs. NEPA;	.65 KGA No Charge
5/22/2020	Review draft Order; Email exchange with co-counsel on same;	.50 TWT

5/22/2020	Review email from court with revised draft Order; Multiple emails with co-counsel on same; Phone call with L.H. to go over same and walk through next steps;	1.85 KGA
5/27/2020	Follow up with JSK attorney by email; Phone call with JSK attorney about whether settlement with Industry might be an option; Report to co-counsel and L.H. on same; Review L.H. response on same;	.55 KGA No Charge
5/28/2020	Email exchange with co-counsel; Prepare and confer with Amanda Carr on proposed modifications of Order;	1.00 KGA
5/28/2020	Review email from Industry attorney asking to schedule talk about Revised Draft Remedy Order; Respond to same with available times;	.20 KGA No Charge
6/1/2020	Review email from CFS atty indicating Nisbet atty has reached out to discuss settlement/draft Court Order; Respond to same;	.25 KGA No Charge
6/3/2020	Email exchange on settlement overtures from defendants;	.50 TWT
6/3/2020	Review update from CFS about Nisbet atty and his conceptual proposals; Provide feed back (mostly negative) on same; Review co-counsel feedback on same;	.30 KGA No Charge
6/4/2020	Email exchange with L.H. and co-counsel on settlement status;	.25 TWT
6/4/2020	Review client feedback on Nisbet conceptual proposal; Review update from CFS about discussions with Intervenor atty and whether settlement was an option for them;	.25 KGA No Charge
6/4/2020	Review draft Press Release from CFS; Provide edits to same;	.55 KGA No Charge
6/5/2020	Review press release; Respond to same;	.25 KGA
6/5/2020	Review L.H. thoughts on draft Press Release; Review revised draft Press Release from CFS; Emails on same;	.30 KGA No Charge

6/8/2020	Review multiple emails from Corps with FOIA Response doc's on permits issued recently; Begin DL of same;	.45 KGA
6/9/2020	Finish DL of FOIA; Email to co-counsel about same;	.85 KGA No Charge
6/10/2020	Email exchange on status of final Order; Review COE response to updated FOIA request (partial only);	2.25 TWT
6/10/2020	Emails with co-counsel about expected Remedy Order;	.25 KGA No Charge
6/11/2020	Review email from court with Remedy Order; Skim Order; Emails to L.H. and co-counsel about same, and likely next steps by Industry and Corps; Follow up with MJS on Atty Fee Petition deadlines; Begin legal research on 9 th Cir. Emergency Stay SOR and process;	.65 KGA
6/12/2020	Review CPPSH Press Release on Remedy Opinion;	.30 KGA No Charge
6/16/2020	Review email from Jim Coon to Court on request for assistance; Email exchange with co-counsel;	.25 TWT
6/18/2020	Email exchange with Plauche and co-counsel; Phone call with Plauche on Appeal issue; Review Notice of Appeal and docket;	.75 TWT
6/18/2020	Review email from Industry atty indicating they plan to Appeal and asking our position on Stay Motion and Consolidation; Multiple emails with co-counsel on same; Review Notice of Appeal filed by Industry; Review 9 th Circuit scheduling Order; Notify L.H. of Appeal and likely next steps;	.65 KGA
6/19/2020	Email exchange with opposing counsel on Appeal, Request to Stay, and consolidation;	.25 TWT
6/19/2020	Review Notices from 9 th Cir. Correcting parties; Review Notices from 9 th Cir. of Industry Motions for Stay and Consolidation and Amended Motion to Stay; Review L.H. email with Industry quotes in Press on appeal;	.40 KGA
6/22/2020	Email exchange with Plauche and co-counsel on Appellate Briefing and consolidation;	.25 TWT

6/22/2020	Begin review of Motions for Stay and Consolidation; Emails with co-counsel about Consolidation issue; Review email from Industry with explanation of Amd Mot to Stay; Respond to same; Review multiple emails with Industry atty on Motion to Consolidate issues, to see if we can reach agreement with them on that matter;	.65 KGA
6/23/2020	Email exchange to confirm consolidation and Briefing arrangement;	.25 TWT
6/23/2020	Review multiple emails with Industry attys on Motion to Consolidate issues; Phone call w/CFS counsel on deadline for Opp to Motion for Stay, and Extension Request needed on same; Locate 9 th Cir. Form for Ext. Mot.; Review CFS follow up email with Industry on the Ext. Request;	.80 KGA
6/24/2020	Email exchange with counsel regarding Briefing schedule and Motion for Extension; Review of draft Motion and comment; Review final Motion and Declaration;	.75 TWT
6/24/2020	Review Industry atty refusal to agree to Ext. of Motion to Stay Opp Memo deadline; Draft Motion For Extension; Emails with co-counsel on same; File same with 9 th Circuit; Update L.H. on situation;	.80 KGA
6/24/2020	Research and begin drafting Opp Memo on Industry Motion to Stay;	4.6 MJS
6/25/2020	Review Intervenor's Response to Request for Extension; Email exchanges on same; Review Interevenor's Response to Mediation Questionnaire;	.50 TWT
6/25/2020	Review Notice from District Court of filing of Transcript from Remedy Oral Argument; Follow up email to co-counsel, about the need for also getting transcript of Merits Oral Argument; Review Notice from 9 th Cir of Industry Mediation Info form filing; Review filing; Send to co-counsel with thoughts on same; Review Industry Opp Memo to our Ext Mot; Emails with co-counsel on same;	.60 KGA
6/25/2020	Continue drafting Opp Memo to Motion to Stay on Appeal; Read Taylor Opp to CPPSH request for extension of time; Email exchange with co-counsel;	5.6 MJS
6/26/2020	Review email exchanges on eelgrass issues and response to Mediation statement; Review Order on Motion to Extend deadline and docket;	.75 TWT

6/26/2020	Review Notice from the Court of option of submitting additional Mediation information; Emails with co-counsel about whether to do same; Review email from L.H. with concerns raised by Coalition member about Industry planting this week in eelgrass areas and how Corps told her that was ok still; Multiple emails with co-counsel on how to respond to same; Emails with Coalition Member about possible Decl for use in Stay Opp Memo; Emails with co-counsel about whether to do a Reply on Ext. Mot.; Review Notice from Court that Ext. Mot. Granted;	.55 KGA
6/28/2020	Review Corps FOIA Response with what are supposedly 6 shellfish aquaculture permit files that are currently being processed but no permits issued so far; DL all 7 files; Skim same; Email to Corps FOIA Officer confirming only 5 files actually sent; Email to co-counsel with update on FOIA results;	.95 KGA
6/29/2020	Continue drafting Stay Opp Memo. Re-read merits Briefs, Orders, and draft argument;	4.4 MJS
6/29/2020	Email exchange with co-counsel on Mediation Order; Review of same; Email exchange with co-counsel and L.H. on Showalter Declaration; Review CFS Response to defendant Intervenor's Motion to Consolidate;	.75 TWT
6/29/2020	Review Corps FOIA response with shellfish operation files currently being evaluated for individual permitting; Review Mediation Order from 9 th Circuit; Emails with co-counsel about how to respond to same; Review Showalter Declaration draft for use with Stay Opp Memo; Provide advice on same; Emails with co-counsel on whether to move to consolidate the CFS Appeal with a CPSH Appeal; Begin review of Stay Opp Memo from MJS; Draft Response to Industry Motion to Consolidate; Edits to same; Review CFS response to Motion to Consolidate; Finalize and file Motion to Consolidate;	1.45 KGA
6/30/2020	Continue drafting Stay Opp Memo; Research harm to appellant/appellee; Draft and revise argument; Continue drafting Stay Opp Memo;	6.5 MJS
6/30/2020	Review revised Showalter Declaration; Multiple emails with counsel on same; Locate case law on the ESA docs that do not substitute for NEPA compliance issues for the Stay Opp Memo; Provide email to MJS with same;	.95 KGA

7/1/2020	Continue research on public interest, individual interest; Continue drafting Opp Memo; Continue drafting and revising Opp Memo on Stay; Check citations; Draft argument on individual and public interest;	7.9 MJS
7/1/2020	Review email exchange on Showalter Declaration and video on eelgrass bed damage from goeduck farm (June 30); Email exchange with Showalter and co-counsel on filing Declaration;	.50 TWT
7/1/2020	Review revised Showalter Declaration; Emails with co-counsel on same; Review Showalter questions about letter to Corps following up on seating and eel grass issue; Provide advice on same; Emails to co-counsel on use of Showalter Declaration in Opp Memo; Review letter sent by Showalter to Corps; Review updated draft Stay Motion Opp Memo from MJS;	1.10 KGA
7/2/2020	Call with co-counsel to discuss Opp Memo on Motion to Stay; Continue drafting Opp Memo; Incorporate Declarations and add factual context throughout arguments;	2.8 MJS
7/2/2020	Attend Zoom conference with co-counsel to discuss status;	1.00 TWT
7/2/2020	Phone call with co-counsel to strategize on Opp Memo and to ensure no duplication of Briefing; Review emails from MJS to Showalter about Declaration edits; Review email from Corps FOIA Officer about additional files for review;	.35 KGA
7/6/2020	Review Standing Rock Sioux Tribe decision; Evaluate for relevance; Forward to co-counsel; Email exchange with co-counsel regarding case and <i>NPRC v. USAGE Ninth Court Order</i> and evaluate for relevance in our Ninth Circuit Appeal;	2.00 TWT
7/6/2020	Review new <i>Standing Rock</i> decision from DC District Court, on vacatur and NEPA Remedy issues; Emails with co-counsel on same; Review Showalter email with report about recent call with Corps following their receipt of her letter;	.85 KGA
7/7/2020	Read new opinions; Draft analysis and add to memo;	3.90 MJS

7/7/2020	Review SCOTUS Keystone pipeline decision; Email exchange with co-counsel on same; Review and edit draft Memo in Opposition to Stay; Legal research on same;	3.00 TWT
7/7/2020	Review L.H. email about 126 Acre Taylor shellfish farm in small Inlet with a number of other shellfish operations being Noticed by Corps for comment; Provide advice on same; Review Showalter email with proposed additions to her Decl; Provide feedback on same; Review emails from co-counsel about edits to revised draft Opp Memo; Review SCOTUS stay of <i>Keystone XL</i> vacatur; Emails with co-counsel about how to deal with same in brief;	1.85 KGA
7/7/2020	Phone call with L.H. about neighbor who is having issues with Taylor expansion of shellfish operations; Review email on same;	.45 KGA No Charge
7/8/2020	Call with co-counsel to discuss Opp Memo revisions; Incorporate arguments from CFS Brief into Coalition Brief; Begin Table Of Authorities (break into bits); Finalize Opp Memo; Email exchange with KGA/TWT. Create TOA, update. Check Circuit Rules for formatting; Conform Brief; Re-check all case-law; Edit memo	9.80 MJS
7/8/2020	Review suggested edits on CIS draft Brief; Review revised Coalition draft Brief;	1.00 TWT
7/8/2020	Review revised draft Opp Memo from MJS/TT; Edit same; Conf. Call with co-counsel and CFS counsel to discuss briefing issues, to try to reduce duplication between Opp Memo's; Review Showalter revised Decl; Review court Order requiring Mediation submission; Review draft submission on same from MJS; Edit same; Send submission to 9 th Circuit Mediation program; Send same to L.H.; Review updated Opp Memo from MJS; Edit same;	2.95 KGA
7/9/2020	Do legal research, review and revise Ninth Circuit Brief; Review filing; Review final CFS Brief in Opposition to Stay;	1.25 TWT
7/9/2020	Review revised draft Opp Memo from MJS; Edit/polish same; Finalize all 4 exhibits; Multiple emails with co-counsel about final Opp Memo; Finalize and file same;	3.60 KGA

7/9/2020	Follow up email to co-counsel on atty Fee Petition issues;	.40 KGA
7/10/2020	Draft letter to USACE attorneys re: eelgrass bed definition;	1.30 MJS No Charge
7/13/2020	Review email from CFS atty about how complimentary, rather than duplicative, the two Stay Opp Memo briefs were;	.25 KGA No Charge
7/14/2020	Review L.H. email with info on Industry having received Millions in PPP \$, but they claim in our case they have laid off 400 employees - those two positions appear inconsistent; .	.25 KGA No Charge
7/15/2020	Review email from Industry atty asking about page extension on Repy; Emails with co-counsel on same; Email to Taylor atty indicating no objection to extension from CPPSH;	.35 KGA
7/16/2020	Review Notice from Court with Industry Reply in Support of Stay; Begin review of same;	.50 KGA
7/17/2020	Multiple emails with co-counsel about Reply, and make up of current 9 th Cir. Motions Panel;	.30 KGA
7/20/2020	Review CPPSH comments on multiple Corps Ind. Aquaculture permits noticed for comment, despite no sign of any cumulative impact analysis;	.30 KGA No Charge
7/22/2020	Review Order from 9 th Circuit denying Stay; Email with co-counsel on same; Docket Briefing schedule;	.50 TWT
7/22/2020	Review Notice from 9 th Circuit that Stay Motion was denied; Review Order; Multiple emails with co-counsel and L.H. on same;	.65 KGA
7/23/2020	Review Order on Industry Appeal and docket; Review and edit press release on 9 th Circuit decision;	.50 KGA
7/23/2020	Review CFS Press Release that went out; Review L.H. comments on same and email to CPPSH members on same; Review email from reporter at Law360 asking for additional information on case background; Respond to same with key briefs and prior Orders;	.45 KGA No Charge

7/23/2020	Review Notice from W.D. of filing of 9 th Order denying Stay;	.10 KGA
7/24/2020	Review news articles on 9 th Circuit denial of Stay Motion; Review MJS email confirming West has agreed to publish Remedy Order in F.Supp;	.30 KGA No Charge
7/29/2020	Review Notice from W.D. of Industry request for Transcript;	.10 KGA
7/30/20	Outline, and begin drafting Opp Memo to Motion to Expedite;	2.80 MJS
8/3/2020	Review email regarding Motion to Expedite and our position; Review Motion to Expedite (Industry);	.50 TWT
8/3/2020	Multiple emails with co-counsel on Taylor Motion to Expedite; Review Industry atty email on same; Provide position of CPPSH on Mot to Expedite to Industry attorney; Read Motion to Expedite; Make notes on response ideas for same;	.95 KGA
8/4/2020	Review Corps Notice regarding intent to review NWP's and evaluate; Email exchange with co-counsel on same;	1.25 TWT
8/4/2020	Review CFS follow up with Tribe on "mature eelgrass" definition;	.30 KGA
8/5/2020	Email with co-counsel on defendant's Motion for Expedited Hearing and coordination of plaintiffs' Response; Review draft outlines on mootness and irreparable harm;	.75 TWT
8/5/2020	Email co-counsel with thought and potential arguments on Mot. to Expedite; Review response;	.55 KGA
8/6/2020	Call with co-counsel to discuss dividing up work to Expedite Motion Opp Memo; Read, analyze, annotate Memo to expedite;	1.40 MJS
8/6/2020	Email exchange on mature eelgrass definition and outreach to Swinomish counsel;	.25 TWT
8/6/2020	Multiple emails with co-counsel on Opp to Mot. to expedite; Review Corps Notice of intent to issue chance to Comment on new NWP 48; More emails with co-counsel on same;	.60 KGA

8/7/2020	Review email from MJS on Opp to Mot. to Expedite; Review Notice from court of filing of Transcript of Merits Hearing in Oct. 2019; Emails with co-counsel about effects, if any, of Corps Notice of new possible NWP 48 on pending Appeal;	.30 KGA
8/7/2020	Review email from CFS about upcoming meeting with Tribe on "mature eelgrass" issues; Respond to same;	.30 KGA
8/9/2020	Email exchange on Mootness; Review Notice of Appeal from Corps and docket;	.50 TWT
8/10/2020	Continue drafting mootness section of Opp Memo; Research case law; Call with KGA; Send draft to KGA for revisions;	2.60 MJS
8/10/2020	Review 9 th Circuit Scheduling Order;	.25 TWT
8/10/2020	Multiple emails with co-counsel about effect of new NWP 48, if one is adopted, on existing Industry 9 th Circuit Appeal and on underlying Orders on Merits and Remedy; Strategize on language to use in Opp to Mot. To Expedite; Phone discussion with MJS on same; Review Notice from WD Court of Corps Notice of Appeal; Emails with co-counsel on same;	.65 KGA
8/11/2020	Combine CFS and Coalition brief sections; Read Order from Court on Corps Appeal; Emails with co-counsel;	1.10 MJS
8/11/2020	Review Court Notice from 9 th Circuit setting Corps deadlines; Multiple emails with co-counsel on how to square those with current Industry Appeal deadlines; Begin review of revised draft Opp to Motion to Expedite; Draft status report to 9 th Circuit Mediator per court Order; Run same by co-counsel; Submit same to Mediator;	1.30 KGA
8/12/2020	Review and edit draft Response to Motion to Expedite including email exchange with co-counsel; Review 9 th Circuit filing on substitution of counsel for Corps and docket same;	1.25 TWT
8/12/2020	Review revised draft Opp to Mot to Expedite; Edit same; Multiple emails exchanged with co-counsel on same; Review email from 9 th Cir. Mediator; Respond to same; Phone call with 9 th Cir. Mediator;	.95 KGA

8/13/2020	Report to co-counsel on Mediator discussions; Report to client rep L.H. on same; Review Court Notice of Joint Opp Memo to Mot to Expedite filing; Emails with co-counsel on same;	.75 KGA
8/17/2020	Email exchange with L.H. and co-counsel regarding new NWP permit and mootness issues; Email exchange on Corps decision to withdraw Appeal;	.50 TWT
8/17/2020	Review emails from Mediator confirming no progress with Industry; Respond to same; Advise L.H. of same; Notify L.H. of same; Review emails from co-counsel on Corps Appeal currently having different time lines, and a question of how we get that Appeal combined with existing Appeals and the time lines sorted out; Review email from Corps atty indicating they have decided not to proceed with their Appeal after all, seeking our position on their Motion to Dismiss the Appeal; Review CFS response to same; Respond to same indicating CPPSH also has no objection to dismissal by Corps of their Appeal; Notify L.H. of this new development;	.40 KGA
8/17/2020	Review email from MJS about Taylor Case Inlet Shellfish Operation being noticed for comment on Individual Permit;	.20 KGA No Charge
8/18/2020	Review MJS preliminary research on EAJA Petition due date if Corps Dismisses; Emails with co-counsel on same;	.20 KGA
8/18/2020	Review email from L.H. about Taylor 10 year Individual permits and the Case Inlet Taylor permit; Provide advice on creation of Individual permits already Noticed by Corps list, and how to use to help bolster current and prior comments;	.40 KGA No Charge
8/19/2020	Email exchange with co-counsel on effects of Corps withdraw;	.25 TWT
8/19/2020	Review Notice from court of Corps Motion to voluntarily Dismiss; Emails with co-counsel about Fee Petition due date; Further research on issue of fees for Appeal work post Corps dismissal;	.40 KGA
8/20/2020	Read reply brief re: motion to expedite;	.60 MJS No Charge

8/20/2020	Review Industry Reply to Request Expedition; Review Order of Voluntary Dismissal and email exchange with co-counsel on same;	.50 TWT
8/20/2020	Review Industry Reply in support of Mot to Expedite; Review 9 th Circuit Notice of Order granting Corps voluntary MTD; Emails with co-counsel on Fee Petition issues;	.60 KGA
8/21/2020	Review mandate and Notice of Appeal; Email exchange with attorney Steve Crane on Fee Declaration;	.50 TWT
8/24/2020	Email exchange with co-counsel on NOAA eelgrass policy; Review 9 th Circuit Order granting expedited meeting and docket same;	.65 TWT
8/24/2020	Review co-counsel email confirming Seattle attorney agreement to review rates and hours; Respond to same;	.35 KGA
8/24/2020	Review 9 th Circuit Order on Expedited Briefing; Multiple emails with co-counsel and L.H. about what "mature eelgrass" means;	.50 KGA No Charge
8/26/2020	Review draft Fee Petition;	.25 TWT
8/26/2020	More legal research on why it is legitimate to recover for time spent on appeal, before Corps dismissed; Emails with co-counsel about same;	.85 KGA
8/30/2020	Review L.H. email with Seattle District Notice dated 8/6 essentially soliciting individual 404 permit application from growers; Provide advice on same;	.40 KGA No Charge
8/31/2020	Email exchange with co-counsel on EAJA Petition for Fees;	.25 TWT
9/1/2020	Edit Fee Petition, add discussion re: Remedy, send to KGA for edits;	1.30 MJS
9/3/2020	Begin review of revised draft Fee Petition and all the supporting Declarations from MJS;	.65 KGA
9/4/2020	Edit draft Fee Petition; Send same to co-counsel for review; Email to attorneys with potential knowledge of Seattle rates, to get 2nd expert opinion on reasonableness (or not) of rates/hours;	1.25 KGA

9/7/2020	Review combined KGA, TWT & MJS hours; Edit same to make additional "no charge" entries and update total's; Revise Hendrick's Decl on EAJA issues; Send same to co-counsel; Review emails from potential 2nd opinion experts; Respond to same;	.90 KGA
9/9/2020	Phone call with potential fee expert PK to discuss case; Email exchange with expert PK about plans for his review and use of his draft Decl; Review USAO Matrix analysis in Petition; Emails with co-counsel MJS on same;	.95 KGA
9/10/2020	Emails with potential fee experts PK and RS about their review and plans for filing of "placeholder" Petition until Industry 9th Cir. review is completed, and then when that is done if we prevail as hoped, use the experts to file supplemental Decl's in support of fees;	.40 KGA
9/11/2020	Provide update to L.H. on why we are filing Fee Petition now, even though Industry Appeal is still pending; Review MJS email to L.H. with draft Decl. in support of fees;	.45 KGA
9/11/2020	Edit Fee Petition to revise remedy discussion; Send to KGA	2.00 MJS
9/13/2020	Further discussions with co-counsel on Fee Petition simplification issues and case law to support same;	.45 KGA
9/14/2020	Review KGA emails on Fee Petition issues; Edit Fee Petition to revise approach to USAO Matrix; Send same to KGA/TWT;	1.6 MJS
9/14/2020	Read Industry brief at 9 th Cir;	1.10 MJS No Charge
9/15/2020	Review co-counsel report on conferral with Corps attorney on Fee Petition issues; Respond to same; Review revised draft Fee Petition;	.65 KGA
9/16/2020	Provide suggested edits to Fee Petition; Begin final review of combined and totaled hours;	.80 KGA
9/17/2020	Re-read our merits Brief; Start outline for response;	.90 MJS No Charge

9/17/2020	Review revised Petition and Declarations; Provide outline of changes to same to MJS; Review MJS revisions; Re-Total hours with final additions;	1.30 KGA
9/17/2020	Revisions/cleanup per KGA email; Send last hours to KGA;	1.9 MJS
9/18/2020	Finalizing and filing Petition and supporting Declarations;	.95 KGA
Total Law Clerk Time:		501.25
Hours Not Charged:		38.75
Hours Sought:		462.50
Total Paralegal Time:		15.10
Hours Not Charged:		1.90
Hours Sought:		13.20
Total KGA Time:		735.72
Hours Not Charged:		164.50
Hours Sought:		570.22
Total TWT Time:		350.30
Hours Not Charged:		30.35
Hours Sought:		319.95
Total MJS Time:		346.49
Hours Not Charged:		21.67
Hours Sought:		325.32
Total Attorney Hours:		1,432.51
Total Attorney Hours Not Charged:		216.52
Total Attorney Hours Sought:		1,215.49
TOTAL AMOUNT SOUGHT:		\$739,545.63
TWT TIME:		\$207,967.50
KGA TIME:		\$364,940.08
MJS TIME:		\$97,596.00
PARALEGAL TIME:		\$1,980.00
LAW CLERK TIME:		\$67,062.05

HOURS SOUGHT - BY TOPIC

Law Clerk hours doing research Memo's and combing records, preparing for litigation and drafting Complaint	324.52
Attorney hours working with client representatives on scope of problem, researching, formulating strategy, and implementing strategy to lay groundwork and prepare for litigation; Legal research on various issues, as well as edits and finish work on and filing of original Complaint against 2012 NWP 48	433.55
Attorney hours on 2012 NWP 48 AR issues, review and respond to Industry Motion to Intervene, comments on 2017 NWP 48, Supplemental Complaint preparation and filing, review Answers filed by Corps and Industry, 2017 AR issues, prepare and file Summary Judgment Motion with supporting standing Declarations	408.49
Law Clerk hours assisting with AR and legal research	137.98
Attorney hours on Briefing Responses and Replies on Cross Motions for Summary Judgment	131.50
Attorney hours preparing for and presenting Oral Argument, as well as post argument briefing (including Remedy)	180.25
Attorney hours on or preparing for Appeal	19.95
Attorney hours on Fee Petition issues	89.95

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Coalition to Protect Puget Sound

Invoice Date: September 13, 2020

Matter: NWP 48 Challenge (Case Inlet)

Costs

6/25/2015	Amtrak	\$88.00
6/23/2016	USDC Washington - Filing Fee	\$400.00
8/24/2016	Nationwide Process Service	\$419.85
9/26/2016	Amtrak	\$70.00
6/28/2017	Multnomah County Court	\$3.00
8/27/2019	Amtrak	\$52.00
9/17/2019	Hotel Max - lodging 9/17 oral argument	\$301.40
9/17/2019	Meal & travel during trip to Seattle for oral argument	\$138.73
2/18/2020	Lexis Search	\$53.00
SUBTOTAL:		\$1,525.98

1
2 **CERTIFICATE OF SERVICE**
3

4 I hereby certify that on September 18, 2020 I electronically filed this
5 DECLARATION OF KARL G. ANUTA IN SUPPORT OF COALITION MOTION FOR
6 AN AWARD OF FEES AND EXPENSES with the Clerk of the Court using the CM/ECF
7 system which will send notification of such filing on the following:

8 Kent E. Hanson
9 Attorney for Defendants
kent.hanson@usdoj.gov

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15 Mark Brown
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17 Dated this 18th day of September 2020.

18 LAW OFFICE OF KARL G. ANUTA, P.C.

19 */s/ Karl G. Anuta*
20 KARL G. ANUTA (WSBA #21346)
kga@integra.net